December 29, 2016

Felicia Marcus, Chair
State Water Resources Control Board
PO Box 100
Sacramento CA 95812-0100

Subject: Comment Letter – 2016 Bay-Delta Plan Amendment & SED

Clauss Dairy Farms has been in business since the 1950’s and our family has been in the dairy business in the Hilmar area since the early 1900’s. Our hope is that we will have viable dairy operation for the future generations in our families. We employ close to 50 employees and regularly support our local community.

Clauss Dairy Farms is very concerned with your Draft Revised Substitute Environmental Document (SED) supporting Phase 1 of the Board’s Bay-Delta Water Quality Control Plan. If approved, your proposal requiring the Merced, Tuolumne, and Stanislaus rivers to dedicate 40 percent of unimpaired flow to fish and wildlife would cause irreversible harm to our region.

Beyond devastating our community by demanding 40 percent unimpaired flows from February 1st- June 30th annually, your staff is proposing taking over control of our locally paid for, built and operated Don Pedro Reservoir. Don Pedro was built specifically to allow our community to survive a prolonged drought, similar to the one we are currently in, but the Revised SED now limits the amount of water available to our community.

In addition, the Revised SED dramatically harms the nearly two-year effort by our local water agencies who are diligently working to achieve the state-mandated groundwater sustainability goals outlined in the Sustainable Groundwater Management Act (SGMA). If implemented, the SED will be the direct cause of groundwater reduction in our region, making it nearly impossible to achieve the state-mandated groundwater sustainability.

As dairy farmers we have to use sound science in every decision that we make. We breed our cows at certain times due to the scientific information we have gained. We water and fertilize our crops at certain times based on scientific research. We understand how valuable water is in this area and we work everyday to be good stewards of the land by reusing our water in many cases 4 times over. We depend on our groundwater and our water deliveries for the Turlock Irrigation District in order to operate. Your proposals would be devastating to our operations and those in our area.

We use the most up to date sound science in our decision making for our operations and we hope that SWRCB would also do the same. Before your board votes to harm our family dairy operation and hundreds of others, the agricultural economy, and our community, please work with the local water districts (many of whom have peer-reviewed most recent science) to look at non-flow measures that can accomplish realistic goals for the environment and the Bay-Delta before considering a flow-centric approach.

Sincerely,

cc: Frances Spivy-Weber, Vice Chair
    Tam Doduc, Board Member
    Steven Moore, Board Member
    Dorene D’Adamo, Board Member