July 23, 2018

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Sent via email to: LSJR-SD-Comments@waterboards.ca.gov

RE: Comment Letter – Revisions to Proposed Bay-Delta Plan Amendments

Milk Producers Council is a dairy farmer trade association, with California dairy producer members stretching from Yuba County in the north all the way to San Diego County in the south.

The proposed new flow standards are premised on the assumption that the major cause of decline of the salmon species is the reduction in flow in the tributary rivers of Stanislaus, Tuolumne and Merced. We are aware of significant research that points to many other stresses for the salmon not specifically related to flow levels.

For you to essentially blackmail the current users of the flows – forcing them to propose, fund and implement other alternative salmon recovery strategies – strikes us as a massive abuse of government police power.

The Delta is a highly altered environment from the way it was pre-human activity, and over the past 150 plus years, much has been done to develop thriving communities in the Sacramento-San Joaquin watersheds. The job of the State Water Resources Control Board is to weigh all factors. This includes seriously considering the threat to the human species by proposing the deliberate increased diversion of water to the ocean.

Other commenters will describe in clear detail the costs of your flow restrictions on agriculture and the economy. All of those costs impact human lives and it is clear that you have not given those human costs the weight they demand in balancing the competing interests during the development of the proposed flow standards.

We urge you to withdraw these new standards and seriously propose other actions to help the salmon that will not dramatically alter the way of life and weaken the vibrant agricultural economy built over generations in this watershed.

Sincerely,

Kevin Abernathy
General Manager

Geoffrey Vanden Heuvel
Director of Regulatory and Economic Affairs
Dear Ms. Townsend,

Please find attached a comment letter from Milk Producers Council RE: Revisions to Proposed Bay-Delta Plan Amendments. Please let me know if you have any questions.

Thank you,

James

James Garner
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