



July 27, 2018

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814-0100

Re: COMMENT LETTER – Bay-Delta Water Quality Control Plan

State Water Resources Control Board

We have major concerns regarding the final draft of Phase One of the Bay Delta Water Quality Control Plan (Plan). The final version does not efficiently manage our water, nor does it protect our communities from very harsh economic outcomes.

An approvable proposal needs to do a much better job of balancing the needs of fish and our communities:

- Unemployment – There will be more unemployed citizens as ag and related employers reduce or close their businesses in San Joaquin, Stanislaus, and Merced Counties. Many of our ag employers are already worn down from ever expanding regulations.
- Homelessness – We can't meet our current challenges and the number of people living on the street will grow. Public assistance levels will grow, and local resources will be strained further.
- Groundwater Management – This proposal is on top of new state regulations to preserve groundwater. We face losing 40 percent of the clean water that has served our area for a century. The residents of our three counties will be dealing with degraded groundwater quality and subsidence in our area.

The Plan does not accurately address the loss of water to our communities. The average loss of approximately 14% sounds innocuous. In wet years this draft proposal works for most stakeholders. The Staff and Board know that in dry years, such as we had in 2014 and 2015, several of our irrigation districts will have 0 water for the cities and farms in our three counties.

We request that all Members of the State Water Resources Control Board vote NO on this proposal.

Thank you,

A handwritten signature in cursive script that reads "Leonard Van Elderen".

Leonard Van Elderen  
President and CEO

Helping Our Members Prosper!

806 W. Monte Vista Avenue  
Turlock, CA 95382  
P.O. Box 3278  
Turlock, CA 95381  
Office: 209-667-2366  
Fax: 209-634-9612

[www.yosemitefarmcredit.com](http://www.yosemitefarmcredit.com)