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March 23, 2013



Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
P. O. Box 100  
Sacramento, CA 95814-0100

To: State Water Resources Control Board

Your proposal, if approved, requiring the Merced, Tuolumne, and Stanislaus rivers to dedicate 35 percent of unimpaired flow to fish and wildlife would devastate San Joaquin, Stanislaus and Merced Counties. Our region is just beginning to recover from the lingering recession. We cannot afford to have crop land fallowed with the loss of hundreds of jobs with an estimated \$187 million loss of agricultural income in dry years. If several dry years occur in succession the losses could be even higher.

This proposal does not recognize the need for hydropower in the summer when the demand for electricity is at its highest. The 35 percent unimpaired flow in the spring would deplete the water used in the summer to generate the electricity. This would raise the cost of electricity for all the residents rich and poor in the affected counties. Also there would be less water to irrigate crops when it is most critical.

This proposal does not appear to be based on sound science. There is no scientific evidence increasing flows in the spring will restore the Delta's native fisheries. This proposal appears to be a demand with not sound science to support it.

This proposal cuts across the both the Delta Stewardship Council's efforts and the Bay Delta Conservation Plan. They are holistic solutions championed by many state leaders from both political parties.

The Board has the responsibility to implement non-flow measures before requiring a drastic plan that will devastate three counties in the Central Valley. I suggest predator suppression as a start. Water is scarce and precious. Before putting family farms out of business other measures must be given consideration.

I strongly urge the Board to reject this proposal.

Sincerely,

Allan James, Ph.D.  
Technical Services, Agronomist