March 7, 2013

To: State Water Resources Control Board:

If approved, your proposal 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 struggling to regain its economic footing after a lingering recession, and we cannot afford to fallow our land, lose hundreds of jobs, and weather a $187-million hit to agricultural income in dry years.

This proposal would also adversely impact hydropower production in our region by taking water from reservoirs during the spring, leaving less water available in summertime; when it is critically needed to irrigate crops and help relieve strain on the state’s power grid.

The proposal is divisive and conflicts with the Delta Stewardship Council’s efforts and the Bay Delta Conservation Plan, a holistic solution championed by many state leaders from both political parties.

Most importantly, however, this ill-conceived plan is based on an assumption that it will help restore the Delta’s native fisheries. This assumption is not supported by science or evidence. Rather, the proposal presents unilateral demands without quantifying the benefit or goal to be achieved.

Before imposing a plan that carries such serious consequences for our region, the Board must first implement non-flow measures. Given the scarcity of water in California non-flow measures, such as predator suppression, must be put in place before the State Water Board puts regional family farms out of business.

We strongly urge the Board to reject this proposal.

Sincerely,

Robert L. Driver
Production Manager
Dave Wilson Nursery