



“Comment Letter-Bay-Delta Plan SED”

My name is Bill Bassitt. I’m President and CEO of the Stanislaus Economic Development and Workforce Alliance. As the head of the organization responsible for economic development and workforce development in a Central Valley county with persistently high unemployment (currently 15.6 %) and one that is victimized by economic challenges not experienced by the rest of the state, I am concerned about the proposed changes contemplated in the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary also known as the Bay-Delta Plan. For starters, I would feel a whole lot better if that plan would be called the Bay-Delta-Valley Plan. But it is readily apparent that the valley is not the focus or concern of these proposed actions.

While there are many concerns that surface in this proposal, I will limit my remarks to three specific areas. While definitely permissible, I find the use of a Substitute Environmental Document in lieu of a full blown EIR to be a terrible alternative to a process that would provide a more complete analysis of the potentially detrimental impact on the agricultural economy of Stanislaus County. The limitations on irrigation that will result from an unprecedented reduction in necessary water volumes will devastate growers, processors, and shippers who provide thousands of jobs in Stanislaus County. I find it interesting that you acknowledge that the impact on agriculture will be “significant and unavoidable.” I agree it will be significant. I would question why it is unavoidable. If there was a balanced and objective approach to determine the truly beneficial uses of water that included a complete assessment of the actual impact to agricultural that was as thorough as the apparent assessment of the impact to salmon, perhaps the projected actions of the Water Resources Control Board might have to be amended. Please conduct a full EIR with a cost benefit analysis regarding both the impact to the fish and the impact to the workers and economy of Stanislaus County. Then, perhaps, that impact on our economy will not be “unavoidable.”

Many of the assumptions reflected in the draft of the proposed actions reflect a rather elementary and flippant understanding of the scope and subtleties of an agricultural economy. A rather casual reference to possible conversion of agricultural land to “nonagricultural” purposes is not an acceptable outcome. Reducing the amount of land available for corn, hay, alfalfa and pasture uses would seriously impact the number one agricultural sector in the county. The dairy industry provides significant year round employment to workers in dairy, milk and cheese operations. Changes in water availability for the crops associated with this key segment of our economy would be devastating. Every per cent of increase in additional flow

would have a very measurable negative effect on the agricultural output of dairy- the linchpin of Stanislaus County's economy.

In the proposed project, as flow is increased and valuable water necessary to sustain and grow the economy of Stanislaus County is sent down the river at the expense of our economy for the economic benefit of southern California, the Bay Area, fisheries and others, growers are advised that shortages may be able to be offset by pumping ground water to augment their crop needs. As agricultural takes more water from the ground and there is less surface water deployed to recharge the water tables, communities that draw much of their drinking water from the ground are going to be placed in further jeopardy as they attempt to manage their growth issues. We do not have enough water now to meet our growing needs. Increasing the flows in the rivers will only further exacerbate the problems. I do not understand why there is little or no discussion about increasing storage of water. If the capacity to store water was increased it seems like everyone might be satisfied. Is this not an appropriate subject for Water Control Board consideration?

Water quality and availability for the citizens of Stanislaus County are being compromised by contemplated actions of the Water Resources Control Board that do not seem to reflect a fair and honest assessment of their total impact. It is apparent that the Board has made a decision on what it intends to do and through various means-namely the use of the SED in lieu of an EIR- has fabricated a plausible rationale to justify the take of water for purposes that satisfy their preordained goals, the economy of Stanislaus County be damned. To be taking these actions in advance of the requirements of the FERC re-licensure of Don Pedro Dam, which may dictate a further take, is incomprehensible. For once let's get government together and coordinate the study, the determination of true and total impact and the collaborative actions steps including increased storage capacity that must be taken to have an honest approach to manage our precious water resources.

Thank you.

William Bassitt