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800	1	I'm the Executive Director of the Merced County Farm Bureau, representing 1,200 farming, ranching, and dairy families from throughout the community, many who have sat behind me today. I come before you to share our great concerns with the proposal you have presented. By scheduling the meetings during the holidays, you've not only impacted the lives of my members, but also those they employ. Most of whom travel to family, at a great distance. On the heels of our California Legislature raising not only minimum wage, but also altering agricultural overtime, this governing body is bringing to question if that even matters. As without water, those same employees will no longer be employed here.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
800	2	Many of our communities are disadvantaged, yet this proposal will remove fresh drinking water from our families.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
800	3	As you know, the Merced Subbasin, and it's been mentioned today, has been declared critically overdrafted. While our leaders are coming together to solve the issue and work to comply, this plan will cease all progression. Removal of surface water from our river will not only allow us to offset the loss that has occurred, essentially, you are declaring our GSPs inadequate before they are written. New Exchequer Dam was built on the backs of many of the families that still call Merced County home. And I'm happy to say that Merced County Farm Bureau played a large role in the beginning stages of the Dam. Since its initial operation, Merced Irrigation District has managed the Merced River as good stewards.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
800	4	We encourage you to review and select the Merced River SAFE Plan, instead of the proposal that was presented today. Time and time again, agriculture has bended. We have adapted to new technology and practices so that more can be done with less. As we are approaching our one hundredth year of service, I would hope that MCFB is able to celebrate another 100. Our economy, agricultural makeup, and community will be drastically impacted should you elect to adopt this proposal.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
801	1	I feel compelled to stand here today, to speak today in opposition of this Board's plan. We have come here with assumptions of water rights. We are told that that isn't so. It's everyone's water. It's the State's water. We are standing, literally, in the middle of the biggest garden in the world, in the middle of a desert. A great experiment that went right in the minds of those of us that live here, and for many in this room today. I feel we are good stewards of the land and of the water. The law of conservation of energy says energy is neither created nor destroyed, it merely changes form. Water can take on potential or kinetic forms of energy, forms of work. Water is energy. What you eventually decide on this issue will impact the energy of the valley and its people forever.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
802	1	I am the Chairman of the Chowchilla Water District; 14,000 acres of Chowchilla is in Merced	Please see Master Response 1.1, General Comments, for responses to comments that either make a general

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		County and it gets -- it gets water from Friant Dam. I also farm in other areas and have been part of the sphere of influence for Merced County. We get our water from MID when it is excess. This is exactly the type of water you're talking about taking and it's not going to be available to us anymore. I wanted to briefly...talk about my experience with Friant, because we get our water out of Friant for Chowchilla Water District. Years ago we made a so-called settlement, like you're talking about...with NRDC, the Bay Institute, Save the Bay, and 14 other environmental organizations. And the idea, according to Senator Feinstein, who gave us the task, try to have a reasonable attempt to bring salmon back and to keep the water, mitigate the water losses for the farmers. It was signed. And before the ink was dry, NRDC was in court, suing so that we couldn't get our water back involving other lawsuits they were in. And so today, we're in a situation where they're still trying to get the water, and we're not getting the water back. The irony is, is that under NRDC's own data, it shows that the water is going to be too hot in the San Joaquin River for the salmon to survive. There's a paper, In Hot Water is what it's called. We did a study, a joint study with NRDC. When they came up with that, NRDC's solution was to stop the study because that does not comport with our legal strategies, so the study was stopped. And as we talk today, trucks are going around, picking up salmon that are stranded on this experiment and taking them out to the ocean. So I don't have a lot of faith in these settlements, unless I'm dealing with honorable people. So in this case, you're coming into Merced County and you're saying, okay, folks, we're only going to take 40 percent. But if you grovel enough, maybe we'll only take 30. That's not how you do a negotiation. First, we need to see the need for this. And I am not impressed with the data that you have. When Mr. Howard came to Merced last time he said, well, he couldn't consider pollution of predation. All he can consider is water, so that's the only solution. And he's depending on scientists. Well, these scientists are the same ones that would take millions of acre-feet out of the Delta for the last 20 to 25 years; it hasn't helped the smelt at all. They're in worse shape than they ever were. So what's wrong with this picture? There's a lot more going on up there than just taking water from the good folks here in Merced. Now, I spent six years in the military, supposedly defending the country against whatever threat there was, as did a lot of these people in Merced County. They're good, God-fearing people. And what I feel now, I feel I'm being attacked by my own government, okay? And I am not going to stand by. I am not going to be satisfied with some dictator by appointees or a tyranny of bureaucracy making decisions. Appointed officials have to get involved and we will get involved, whether we have to use techniques of Martin Luther King or whatever. Last comment. I want to congratulate you. You've done one thing that we've never been able to do here. You have got this community united, okay, and I want to thank you for that.	comment and/or may generally be in support of or in opposition to the plan amendments, or do not raise significant environmental issues.
803	1	I'm here partly because of Chairwoman Felicia Marcus's recent op-ed inviting the Bay Area to help "bridge divides between companies, farm and fish, and find creative ways to help all three survive. So I'm on board to do that. I am disappointed that there aren't hearings in the Bay area given that we get a lot of our water from these three rivers, especially. And the sentiment would be quite different if it were in the Bay Area. Contrary to the General Manager of the SFPU's opinion that it will be a disaster if water is cut there, Peter Drekmeier of the Tuolumne River Trust has shown that the assumptions that they've -- or	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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		the staff has based their analysis -- on are faulty.	
803	2	So I believe that the residents of the San Francisco and the Bay Area will be behind increasing water flows. And personally, I would like to see them up to 60 percent since that seems to be the overwhelming science behind it until I hear otherwise. Fish is often the bête noire right, of the farmers, but in fact the commercial fishing industry has suffered for decades and many jobs have been lost there. So I want to make sure that's kept in mind	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
803	3	Just some of the ironies I've heard today and elsewhere that agriculture makes progress on water conservation yet expands into new marginal lands with new irrigation needs. For example, orchards in southwestern San Joaquin Valley and around 120 on Knight's Ferry, water-intensive crops are grown when certain towns have completely run out of water. Permanent crops with 20- year life spans are being planted during a drought, making it impossible to fallow fields. Irrigation districts present dire projections based on the threat of decreased supply without mentioning how much progress they've made in lowering demand. Those are just some of the ironies I've found. Finally, even if we stopped all fresh water from flowing to the Bay, I think as the population of California grows to 50 million in the next couple of decades we would be here anyway. And it's not fish, it's people. And we've got to decide whether agriculture can maintain its 80 percent use of water supplies or if we have to cut some back and give it to cities. That's my take	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
804	1	As scientists, my family applauds you for defending the cause of salmon. We must stand up for our wildlife, ensure its nurture and thriving. But as strongly as I believe in this value, I feel just as strong about the principle found in the Hippocratic oath of doing no harm. There is nothing gained when you promote the welfare of one part of life to the injury of another.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
804	2	As a farmer, I want to caution you that you would devastate agriculture if you continue with your proposed solution. We farmers cannot exist on less water: we have made heroic measures already to reduce our water consumption and any less threatens the life of our trees. There is a minimum required for health. The Central Valley is considered the great Bread Basket of the World. It blesses you, your family and the rest of our nation with abundant, cheap food and that abundant food is part of our national security.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
804	3	It is also for another casualty that I stand before you today: the young children of the farm laborers in our farming communities. For many years I taught them in the farming community of Ballico Cressey. Their families came to our agricultural counties for a better life. The ranches up and down the valley have provided their parents with hope, jobs, and security. The farm workers' children, whom I believe have every right to expect nurture and thriving as the salmon, have been nurtured and have thrived. They are growing up to be hard workers, good citizens and have a bright future. If you pull the water from our farms, you will effectively strangle their parents, as you choke the life out of the farms providing their parents jobs. This work is what they know, and they are good at it.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
804	4	Please reconsider the principle of "doing no harm" when you design a solution for the salmon. Please put all the resources available to you to promote healthy salmon, environment and healthy farms.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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804	5	Please consider implementing the alternative Merced River S.A.F.E. Plan.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
805	1	I first started learning about the water situation here just a couple of years ago just out of curiosity, because I really didn't know anything about water. And right now I'm just like overwhelmed with information. And we definitely have a crisis in our ecosystem here. And I think I started taking an interest in the water because I first learned about the water issue being involved in a local Asian-based social service agency. We had received an enormous grant to educate people about the mercury level in the water. And I just got grossed out because I thought, "Oh my gosh. I grew up eating fish from the Delta." And I thought, "Oh my gosh, I have mercury poisoning." And then I got involved in gardening and urban farming in this area. And before I planted anything I would check to see what was viable to plant in our local soil. What was feasible to grow when and where? And then I started thinking like, "Wow. I checked to see what is viable for me to grow in my backyard. So I didn't understand like "why were we exporting water to grow a water-intensive crop in a sandy arid area?" So I think that's one thing that I really would like to Board to look at is the amount of export that we have from the Delta river. I mean, we really need to have some kind of permanent reduction in exports in order to maintain the quality of our Delta estuary system. You know, we've heard so much expert testimony about the salinity levels and how it could affect the south Delta. And basically my mind is just like overwhelmed by the information that I've learned today. But you know just from a very grassroots level, I think salinity is salt. Why would you want to increase the salt in your soil? It just doesn't make sense. So from my perspective and the perspective of my community, one thing I'd like to do is bring more awareness, more education, and more engagement from my community, because we are not aware. I mean I think with more advocacy and outreach we will become more aware. And I just ask the Board to look at some of these environmental justice issues. We are most susceptible to toxins and hazardous wastes.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
806	1	I'm in total support of the MID SAFE Plan. I think it's a very good plan. And with the Water Board looking into it, I appreciate everything.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
807	1	As Merced County Supervisor, I'm here to share my concerns and the concerns of my constituents, the people whose lives will be directly impacted by this proposal. Many of the impacted communities in Merced County are disadvantaged communities. These constituents cannot take the day off to come here and share their concerns that this proposal will dramatically increase the rate to their drinking water beyond what they can afford, or that this proposal may cause the fallowing of prime agricultural land, resulting in job loss, or the concern that this proposal may result in their children's schools not having clean, safe drinking water.	Please see Master Response 2.7, Disadvantaged Communities, regarding the assessment of potential impacts of the plan amendments related to disadvantaged communities (DACs), the human right to water as it relates to DACs, and the State Water Board's technical and financial assistance programs for DACs. Please refer to Master Response 8.4, Non-Agricultural Economic Considerations, regarding the potential rate increase to municipalities in the plan area, including DACs, as well as case studies presented in Chapter 20, Economic Analyses, Section 20.3.3, Effects on Municipal and Industrial Water Supplies and Affected Regional Economies. Potential impacts on agricultural production due to implementing the plan amendments are described in Chapter 11, Agricultural Resources,. For further discussion of the potential impacts on agricultural resources and the associated economic implications, including potential effects on employment in the region, please

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			see Master Response 3.5 Agricultural Resources, and Master Response 8.2, Regional Agricultural Economic Effects.
807	2	While the SED's economic analysis shows economic impact of 433 job losses and $64 million impact to the regional economy of over three counties, two other independent economic analyses have different stories. These analyses show that appropriate 900 jobs will be lost here in Merced County alone, with an economic impact closer to $231 million. Again, this is Merced County only, not the region. Not taking into account the validity and the unreliable water supply to a region slowly recovering from the recession, this will be devastating. When your staff was asked direct questions about the economic impact of volatility and reliability, they deferred to you, the policymakers. So I ask, what would you encourage us to tell companies that we're trying to attract and come to the region for economic development when they ask about the reliability of water supply?	Please see Master Response 1.1, General Comments, for general information regarding the economic analysis and effects. Also, please see Master Response 8.1, Local Agricultural Economic Effects and the SWAP Model, and Master Response 8.2, Regional Agricultural Economic Effects, for discussion of the agricultural economic effects.
807	3	Water supply in Merced County should not be in jeopardy. Merced County has some of the oldest and most senior water rights in the State of California. We paid for those rights, now this proposal suggests taking them, again, taking them.	Please refer to the discussion of water rights in Master Response 1.1, General Comments, and the Water Rights priority system discussion located in Master Response 1.2, Water Quality Control Planning Process.
807	4	Every year we roll the dice and react to Mother Nature, what Mother Nature brings. With the SED, the State Water Board is asking us to play Russian roulette. This community has developed and funded a complex water distribution system and built one of the earliest reservoirs in the state to provide reliable water supply that benefits agriculture, the economy and the groundwater basin. Leaving an existing and available multi-million acre-foot reservoir always close to empty is a stranded asset and a failure in water management. As a representative of my constituents here in Merced County, I stand opposed to this proposal. Please take these comments into consideration. The presentation we heard talked about fish. I'm talking about humans.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues. Specifically, refer to the Service Providers section regarding general information on reservoir levels. Please refer to SED Chapter 5, Surface Hydrology and Water Quality for a detailed discussion.
808	1	What you are suggesting with your plan will destroy families and communities, period. You may say the impacts of the SED is unavoidable. In fact, they are avoidable. Farmers have always been excellent stewards of their lands. It is in their best business interest to do so. Merced MID has always been a collaborative partner and steward of the Merced River, and we desire to continue to do so. But we cannot support any plan that destroys our community and unduly burdens us to fix problems that exist through the system that were created by others and condoned by the state.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues.
808	2	We [Merced Irrigation District] have good ideas on how we might achieve benefits for salmon in the Merced River and do it in an equitable way that allows our community to survive and others to accept their level of responsibility. Our SAFE Plan is an equitable plan that takes science into account for the betterment of salmon, agricultural land, reasonable flows and good for the environment. We are responsible people but make no mistake, we may be only three percent of the inflow to the Delta, but we will provide 100 percent resistance to your current plan. You can work with us or we can work against you. My direction to my board is to educate, and then fight.	Please see Master Response 1.1, General Comments, for responses to comments that generally oppose the plan amendments, a percent of unimpaired flow, or an LSJR alternative. Please see Master Response 2.4, Alternatives to the Water Quality Control Plan Amendments, regarding information about the S.A.F.E. plan. This comment does not raise significant environmental issues.
809	1	The Bay Area is home to California's most valuable economic asset. The San Francisco, Oakland, San Jose Metropolitan area boasted a $667 billion economy in 2015. If this region	Please see Master Response 1.1, General Comments, for responses to comments that either make a general

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		was its own country, it would have the 22nd largest economy on earth. San Jose's economy alone grew at a rate of 8.9 percent in 2015, outpacing even China. Despite only having 17 percent of the state's residents, the Bay Area generates about 30 percent of the state's general fund revenues. But the Bay Area economy cannot function without water from the Tuolumne River. Water from the Tuolumne River accounts for approximately 85 percent of San Francisco's fresh water and about 55 percent of the fresh water for the 1.8 million described by our previous presenter in the BAWSCA service area, across four counties. If the Bay Area's Tuolumne River users were their own hydrologic region, they'd have the lowest water rates in California. Residents in the San Francisco-BAWSCA combined service area used just 54 gallons per day over the last 12 months, compared to the statewide average of 82 gallons. San Francisco residents themselves used just 41 gallons per person per day in 2015, one of the lowest in the industrialized world. However, the San Francisco Public Utilities Commission estimates its users would face cuts up to 50 percent during droughts with rationing beginning immediately after a first sign of drought. This level of rationing could only be avoided by major investments in new supplies that have no certainty of being able to be procured. Because the Bay Area is already the lowest water user in California, these cuts would leave our region no place to go. And could have devastating economic impacts by crippling our already overwhelmed housing supply and undermining water-intensive institutions such as hospitals, academia, the biotech industry, and data centers. Between 2011 and 2015 the region created 500,000 jobs and just 65,000 new units of housing. This imbalance has led to skyrocketing and inequality and the widespread displacement of poor and middle-class families. By 2040 the region is projected to create an additional 1.3 million jobs necessitating 820,000 new households. The draft SED, we fear, could forever and completely put solving the region's housing crisis out of reach and force our employers to expand elsewhere. In conclusion, the Bay Area likely creates more economic value per gallon of Tuolumne River water used than is created by any other water source in California, and probably the United States. The Bay Area Council applauds the Board's intent to improve the ecosystem of the San Joaquin River and its tributaries and appreciates the difficulty in balancing the human needs of water and the environmental needs of water. We urge the Board to take whatever measure is necessary to meet these competing needs through voluntary agreements.	comment on the plan amendments or do not raise significant environmental issues.
810	1	I also agree with everything that's been said, and hope you hear well.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
811	1	I represent the third generation of farming families that have been here approximately 100 years now and we farm in the South San Joaquin Irrigation District. You probably already know, but I'll reiterate that most of us, because of the high cost of farming in California have gravitated toward permanent crops and what we call specialty crops. In the case of our family, we are vertically integrated and completely grow only almonds. Along with the third	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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		generation that I represent, we have a couple members of the fourth generation now for succession of our family farm. And I've got some grandsons and granddaughters that are anxious to be the fifth generation. What causes me to come here today and share time with you this morning is that I don't see an opportunity. I see a glimmering of hope for that to happen with this Plan. I know you've spent a great deal of time and effort working on the science and looking for opportunities to solve some of the problems that we have with water in our basins. It seems to me from my perspective that we're being asked to make a disproportionate amount--or share a disproportionate amount--of pain in the counties of San Joaquin, Stanislaus and Merced. It seems to me, I know you asked that we not look for others to share, but I think we could take a little bit of water from a lot of places instead of a lot of water from these three tributaries.	
811	2	I was here for your opening comments this morning and I appreciated that you said that there was a toolbox and that there were tons and tons of tools in that toolbox. I think we've looked a little too much at the flow toolbox. I think to me, I'm a farmer, I'm not educated in what you're educated in I'm sure, but the biggest thing I look at is there are some predators in the Delta that are eating those salmon. And I certainly think the very first tool we ought to take out of that toolbox is to consider, or maybe even possibly eliminate, those predators that weren't native to the Delta in the first place. I don't think that's been considered yet or it's happening.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
811	3	We have spent a great deal of time and resource and capital studying the rivers through our irrigation districts. We have a great deal of science to share with you as well as the science that you share with us. I would ask that we change the path that we're looking at. I would ask that we sit down together collaboratively, share that science and look for other opportunities before we devastate an industry that in the case of my family, we have spent generations investing in.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
811	4	There are a great deal of banks and commercial entities that have bought bonds for the huge amount of capital that [it] took for us to build the basin that we have. They were all based on a guaranteed water right that we thought was impenetrable. And yet now, suddenly we learn that maybe that's not so. I just ask that you look for other options besides this unimpaired flow. The unimpaired flow will provide water for us in most cases, but how do you maintain these crops like tree crops on years when there's drought? I know you talked about using groundwater, but you've probably heard plenty of testimony already today how that option is diminishing from our opportunities.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
812	1	Groundwater impacts need to be discussed. Before the drought great strides were made implementing conjunctive use projects as well as technological advancements in water delivery systems in the Eastern San Joaquin Basin. With the loss of surface water deliveries, groundwater will continue to be overdrafted, despite the implementation of the Sustainable Groundwater Management Act looming. This not only impacted ag, it jeopardizes safe water deliveries to the communities like Escalon, Ripen, Manteca, Tracy, that currently rely on groundwater to supplement their water supplies. Phase 2 will do the same to our north communities.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
812	2	Economic impact. Billions. According to our most recent General Plan Update, ag in San Joaquin County alone contributes $6.6 billion in local economic output.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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		And those numbers were from 2007. Despite recent droughts and even some loss in commodity prices, overall in the last 10 years, ag has increased in economics. The dollars lost in ag will impact the entire community. The District Attorney's Office covered it. With opportunity, when it is lost, industry is decimated. A way of life is gone. The only thing that fills in is crime. That will not only be in the rural communities in San Joaquin County, but the smaller cities and Stockton as well. Stockton is good on crime.	
812	3	Water quality degradation in the south Delta. One of the things we find most troubling about the SED is that you're asking to take such huge amounts of water from the community and send it down river and there are no real water quality benefits downstream. Instead, we see a set in stone permanent relaxation of the temporary changes that have been too common throughout the drought. Current water quality standards need to be improved and, more importantly, enforced throughout the entire irrigation season to protect the water quality, the crops, and the soil within the Delta.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
812	4	If we're going to talk about fish, we need to talk about predation. No matter the amount of water you send down, no matter what the temperature of the water. When you're eaten alive, it doesn't matter. Dredging, dredging can help with the overall temperature in the Delta to help fish. Another major impact is the non-native invasive plant life. The Egeria densa and the Hyacinth are a problem. The evaporation transpiration loss is bad for everything. It doesn't help fish. It doesn't help farmers. It doesn't help the communities. It doesn't water to export. It needs to be fixed.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
812	5	[N]obody is more invested in the health of the fisheries literally and figuratively than the irrigation districts. Why not allow them to continue to work on habitats, spawning beds, and other measures that have been shown to be effective.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
812	6	In ag, we have a simple saying about anything we apply to our crops. Right time, right place, right amount. Throwing unnecessary water at the fish is not a guaranteed benefit to them and at the same time will devastate local communities and accelerate the degradation of water quality in the south Delta.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
812	7	Us farmers are proud. We built these communities in San Joaquin County. We provide the safest food in the world. We can provide the most food of anyone in the world. Please allow us to continue to do that.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
813	1	To be successful a plan must provide a clear and specific benefit to the public. The benefits of SEDs are unclear. The only clarity that this proposal holds is a negative impact on this region. The taking of 40 percent of the Merced River water supply -- Watershed supply, and the timing at Christmas, and the speed, the speed, the final decision in a few weeks of the SEDs process, greatly concerns me. I don’t like it when I see a big project coming and there hasn’t been enough time to really understand it, correct it, make the tweaks to it. You need to make it successful for everyone. I hope that those comments are something that you do actually listen to. We need to be successful as a region. We need to be successful as a state. Water is really important to everybody. And there doesn’t -- there shouldn’t be massive, massive differences between	Please see Master Response 1.1, General Comments, for responses to comments that make a general comment regarding the plan amendments. Please refer to the section describing public review and public outreach and the section acknowledging the concerns of community members and elected representatives.

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		the benefits and the detriments. The proposal as it is right now, in my opinion it's flawed. It creates massive change to Merced County. It creates massive losses to this region. Our economy and our culture has the potential to be destroyed by the proposal as it's written. The region will suffer terribly while others prosper. Please listen to our community. Please ease our concerns by working with us to provide a better plan for our region and for the State of California.	
814	1	My name is Dennis Yotsuya, and I'm a Board Member and the Treasurer of the Bellico Cortez Water District. And we are located in Merced County, north of the Merced River, and south of the Merced/Stanislaus County Line. Our District's approximately 7,000 acres, and it encompasses approximately 160 farms. We are about 85 percent permanent crops and the remainder of row crops, annual crops. We rely solely on groundwater for water supply. We have no surface water available to us. And, historically, our groundwater has been recharged by TID, which borders on two sides of our district. Since groundwater is basically our--the only source of water, it's very important to us to maintain that supply. And, so, we've been involved with the groundwater management legislation in the '90s, and now with SGMA. And we feel that if there's no surface water for a recharge, we're going to have a hard time complying with SGMA. We do request that the Board consider the impact of the additional flows on SGMA, because we are going to have a hard time complying without surface water.	The State Water Board acknowledges that it will be challenging, but SGMA compliance cannot occur at the expense of reasonably protecting surface water beneficial uses, and implementation of the plan amendments does not conflict with SGMA compliance; together they allow for integrated planning of scarce water resources that does not trade impacts between surface and groundwater. It will be up to local entities to determine the precise actions that would be taken in response to implementation of the plan amendments, with or without the future condition of SGMA. SGMA was incorporated in the SED groundwater analysis, and the cumulative impact of SGMA on agricultural resources was discussed in Chapter 17, Cumulative Impacts, Growth-Inducing Effects, and Irreversible Commitment of Resources, Section 17.2.2, Cumulative Impact Analysis. For further discussion on these issues, please see Master Response 3.4, Groundwater Resources and the Sustainable Groundwater Management Act.
814	2	We would like you to consider working with the local irrigation districts on the salmon enhancement, because they've put a lot of time and money into researching and trying to figure out what works on their river.	Please see Master Response 1.1, General Comments, regarding the public outreach process and voluntary agreements.
814	3	The proposed additional flows will make compliance with SGMA virtually impossible because the only recharge is from surface water irrigation. If there is no recharge the only solution in order to comply with SGMA is to take land out of production. I am a local family farmer, farming 40 acres of half in almonds and half in walnuts, I would go out of business if I had to idle 25-50% of my farm.	Please see Master Response 3.4, Groundwater and the Sustainable Groundwater Management Act, for discussion of SGMA compliance and Groundwater Recharge.
814	4	I am grateful that our industry funds research at UC Davis in crop enhancement, irrigation efficiency and many other farming issues but the application of that research must be applied locally to my farm and the conditions which I know best. I believe that the issue of salmon enhancement should likewise be considered locally. The Merced, Turlock and Modesto Irrigation Districts have spent many hours and dollars studying and applying their local research to the Merced and Tuolumne rivers to enhance the fishery therefore their conclusions and recommendations for non-flow alternatives for solving predation and improve habitat must be part of the solution.	The State Water Board used the best available science throughout the SED. A variety of data were obtained for the water quality planning process: quantitative data from peer-reviewed published literature on topics specific to the plan area; peer-reviewed published literature outside the plan area but on topics relevant to the proposed project; unpublished quantitative data from within the plan area and from outside of the plan area; qualitative data or personal communication with topical experts; and expert opinion if no other sources were available. Additionally, please see Master Response 5.2, Incorporation of Non-Flow Measures, regarding the role of non-flow measures in the plan amendments.
814	5	The Ballico-Cortez Water District urges the Water Board [to] consider the impacts to groundwater recharge and the sustainability required by SGMA and consider a whole river solution, predation, habitat restoration and local research and local river control operation for salmon enhancement. We are sending a resolution stating this and other concerns to the	Please see Master Response 3.4, Groundwater and the Sustainable Groundwater Management Act, for discussions on SED consideration of SGMA and groundwater recharge. As described in Appendix K, Revised Water Quality Control Plan, the State Water Board recognizes that non-flow measures must also be a part of

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		Board.	efforts to address Delta aquatic ecosystem needs as a whole and encourages voluntary agreements.
815	1	It matters where and how we plant people, food and fish. We matter. All of us here matter. You matter. None of you live in an area that wouldn't exist without dammed rivers. I hope you guys consider that, the dammed rivers. We don't have unimpaired flows anymore. We have people that are living in this state that are going to be -- it's over 40 million. How are we going to feed ourselves?	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
815	2	I agree with the SAFE Plan. You need to implement it. And you don't need to go over what they've asked and said they would do. You just need to implement what all the irrigation districts have been doing and are willing to do.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
815	3	Our food is important. How we grow it, where we grow it, it all matters. We need water. And without the discussion about more storage for cooler water, it's ridiculous to even be here.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
815	4	So this piecemeal approach is not practical, it's not good. It's not good for our tax dollars. It's not good for the future that you just saw here, a fantastic group of young people here, the largest FFA Chapter, all urban, in the State of California, along with others that were here that weren't able to speak and had to leave. So I ask you, we can't -- we can give you written comments. Are you going to read the 400 pages? Are you going to read all the comments that we're going to submit? Because we were here en masse. We were here en masse, but we're not. But believe you, we will continue to keep our feet here and live. My grandson will be seventh-generation resident of Merced County. They came to farm here after the gold played out. We have rearranged our community and our state. We have to live in what our reality is today -- not what we wish it was, not where it was, what you think is going to be here. That's what the presentation to the Board of Supervisors was, well, we're assuming, we believe. That is not a document that is legally protected. So I ask you here, you need to take it seriously, what we're asking you to do, and consider us as important as you all are, where you live, that you wouldn't have the water you have without what we have done and the ability to feed yourselves. I agree with Congressman Costa. I have said this for 20 years, this is a matter of national security. If we cannot feed ourselves, where are we going to get our food? Do you want to rely on China? Hell, they were trying to kill their kids with their formula. Our pets were at odds. Come on, we have the safest, most abundant food supply right where you're standing -- We built on the most productive land throughout this state. So where are we going to be 40, 50 years from now? The decisions you make today are very important. Please consider us all	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
816	1	One of the things that we have come up with — I have been in this business since I was 14, in Merced County. I've been dealing with friends and family. Everyone that you see here, I've probably done business with.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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		One of the things that I want to talk about is exactly what Mr. Rowe had a slide up here, a while ago with, was the water issue of dry wells. As a member, as a family that depends on a well, our store, in 2015, supplied over 200 2,500-gallon tanks and systems to people that had woke up in the morning and had a dry well. We supplied the pumps, the whole system. In fact, at this point in time, I believe that all of us here, if we're paying our taxes like we should be, are supporting, still, the people because we're supplying them with the water for those. Up to this year, we've supplied almost a hundred more tanks. This issue is not going away. By reducing the amount of water that these gentlemen are able to use, is not only going to affect my business, my employees — we had a conversation about this last week, as to if this moves forward, how it's going to affect our company and the number of employees. My employees have been there for 10, some 20 years. I would hate to go to them and say because these gentlemen can't do their jobs, can't farm the ground, that I'm going to have to reduce staff. But that's exactly what you're — with this water issue, is what you're saying is going to happen.	
816	2	I applaud what MID is doing and I would ask that you continue to work with them and see if there's another solution, than what is proposed today.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
817	1	I want to make sure you understand that those over 800 signatures I delivered to you, in Sacramento, are an example of some of the hardworking people of Merced County. I am here, today, to again let you know that the 4,500 parents, soccer players, and families in the Soccer Academy Merced Atlas are against your proposed plan. Most of those families work all day and are not able to come here today. You make decisions without taking us account. We are here, today, because we do count. And your proposal is going to impact us a lot.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
817	2	Our trees right now are dying, and many other living things are being affected by the lack of water. Thousands of trees have died. They continue to die because there is not enough water right now in our community. So, you are directly affecting the standard of living of our community with this proposal. In essence, what you are doing is taking from Peter to pay Paul. Taking water from our community to pay to other communities. In the long run, you are adding to the problem. Therefore, I am asking you to reconsider your proposal and find other ways that will not damage the future of our youth. You might even consider the MID SAFE Plan.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
818	1	1 I'm able to farm rice because of the Merced Irrigation District and the water that is stored in Lake McClure. I do not pump groundwater. So, without this stored water from the Lake, I would be out of business. You have heard and will hear more about all of the crops that are grown here. Some of these crops are grown nowhere else in the world, or only a small amount in other places. Therefore, I will not belabor that point.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
818	2	2 I would like to talk to you about what I call the untold hidden benefits. I would address three points, economic, recreation, and environmental.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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		Of course, you're aware of the obvious economic benefits of farming, but you probably do not notice the hidden benefits. Every year, thousands of people come here to hunt and fish on private farmland. This farmland is here and productive because of the water supplied by Merced Irrigation District, and the water that is stored in Lake McClure. The people that come here also buy here, and support local businesses. They buy gas, they buy food, they stay in motels. I have a friend that comes here from Oakland, California, and comes here at least twice a month in the summer to fish for crawdad. You may know crawdads by other names, such as crayfish, crawfish, or little lobsters. Of course, when my friend comes here, he spends money here. He loves to fish for crawdads and eat them. However, other people catch them to use for fish bait. I have a man that comes here from Los Angeles to trap crawdads and sell them for bait. In some lakes, you cannot use minnows, but you can use crawdads. He sells his mostly to Pyramid Lake. Think of how much money he spends here. I also have lots of local people that come and catch crawdads to fish for bass in the Merced River.	
818	3	Just think, a crawdad that was caught in my rice field goes to catch a bass, which is the largest predator of trout, steelhead, and salmon. Because of my rice farm, that I would not have without stored water, more salmon will live and return to the ocean, and then return here to complete their lifecycle.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
818	4	We also provide habitat for a large array of birds and mammals. No one thinks much of mice, gophers or other rodents. However, these rodents, that are abundant in farm ground, are a critical part of our ecosystem. The Red-tailed Hawk, the fox, the coyote, are just a few of a very large group that need rodents to survive. A study by the California Rice Commission found that rice fields are home to 230 wildlife species, and we provide nearly 60 percent of the food for millions of ducks and geese. We are farming next to the National Wildlife Refuge.The Refuge does not have enough land or food for the birds, so the birds move onto private farmland. That land is made possible because of the stored water in Lake McClure. During the drought, when there was not enough water to farm, the birds were forced to crowd together in the Refuge. This caused a large outbreak of disease because of overcrowding. However, now you can see them flying in my rice fields early in the morning. They stay and eat all day, and they fly out in the evening. If we are forced into another drought because the water cannot be stored in the Lake, but instead flows out to the ocean, where it serves no purpose, the birds and the people will suffer. The Merced Rice Farmers have also partnered with the Nature Conservancy to provide critical habitat and nesting area for shore birds. We re-flood our rice fields after the rice has been harvested, and allow water to stay there all winter. This re-flood water is made possible because of the water from Merced Irrigation District. If our water is not stored properly and, instead, allowed to flow unimpaired, none of the benefits I have listed here	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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		would be realized. Remember that every man, woman, and child, regardless of how much money or power they have, still eat three times a day. Please do not take away our ability to feed this great nation and the world. Thank you.	
819	1	I have a question for the Water Board, you guys. Could you please tell the audience what law gives you the authority to double or more the amount of water you can take from the irrigation districts? CHAIR MARCUS: Well, it's a combination of the Water Code and the public trust. I mean, it's more complicated than that, but it is actually - MR. TESSIER: But there is no law that says you have authority. CHAIR MARCUS: That's Water Code. MR. TESSIER: Water Code? CHAIR MARCUS: Yeah. It's Porter- Cologne. MS. SPIVY-WEBER: It was passed in - CHAIR MARCUS: Yeah, passed in - MS. SPIVY-WEBER: - '69. CHAIR MARCUS: - '69, I think, yeah. MS. SPIVY-WEBER: Back in '69. CHAIR MARCUS: It's kind of old. There actually is, but we can - MR. TESSIER: The Code says you can take any amount you want in percentages? CHAIR MARCUS: Oh, gosh, no. I mean, we set the -- we can set the flows. We're supposed to be setting them. They're overdue over a long period of time. And then it gets allocated in a water rights proceeding later on, using the full seniority system. MR. TESSIER: Because I think if our, like some attorneys were to look into this, I think they would probably find you're overstepping your boundaries.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
819	2	Places like Mendota are devastated from unemployment from no water. We are here called the Appalachia of the west, that's how poor this area is. And you're taking away that water is just going to make it more poor.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
820	1	In your introductory slides, I saw the term "reasonable" put up there multiple times. My understanding is you have a regulatory requirement that the decisions you make be reasonable. I think your plan, that's based on inaccurate and incomplete information is completely unreasonable. But worse, I think your plan is totally unnecessary.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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		Now, you many wonder how I come to that conclusion? By this scientific report, I have in my hand, and I'm just going to read just a couple of quotes from the report. First of all, I want to tell you where the report comes from. It is the written testimony of Doug Demko. Doug Demko is a fisheries scientist. He is also a principal of the firm called FISHBIO. FISHBIO is a world-renowned scientific fisheries research organization. It has done fish studies all over the world, including the United States. FISHBIO has done the most studies on the Stanislaus River of any other organization. The document I have in front of me is the written testimony, dated February 10th, 2016, provided to the United States House of Representatives, Subcommittee on Water, Power and Oceans. "California resource agencies sink tens of millions of dollars every year into a failing effort to protect native and endangered fish species, while also bolstering introduced, top-level predators that are decimating the very fish they are required to maintain." "The Central Valley Project Improvement Act of 1992 actually requires protecting and improving both introductory predatory striped bass and salmonids, an illogical contradiction of science and policy." "Increased flow appears to be the popular red herring for recovering native fish populations, but scientific studies continue to indicate that water releases from dams are no silver bullet: more water doesn't equal more fish. Or, it's impact on survival is small enough as to be difficult to establish." "The problem, ignoring unnatural and excessive predation of native fishes." In the spring of 2015, "A predation study in the Lower San Joaquin River, near Mossdale, was conducted by NOAA Fisheries. Predators were found to outnumber Chinook salmon by a ratio of roughly 200 predator for every one Chinook salmon." "Simple and straight forward changes to California sportfishing regulations should be implemented to remove harvest limits and size limits on stripe bass and other non-native predators." These are quotes. "February 10th, 2016: Despite continued pressure on California Department of Fish and Wildlife through various mechanisms, which are research, monitoring studies, and through the litigation sediment and sediment process, no action has been taken to address predation or predation impacts in any meaningful manner. Perhaps more importantly, striped bass sportfishing regulations have remained unchanged."	
820	2	[ATT 1: 2016 Predation Testimony. Written testimony of Doug Demko, February 10, 2016. United States House of Representatives Subcommittee on Water, Power and Oceans. The Costly Impacts of Predation and Conflicting Federal Statutes on Native and Endangered Fish Species.]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
821	1	The unimpaired flows will seriously reduce the groundwater recharge, both within the Merced Irrigation District and the surrounding areas of the Merced Subbasin. These reduced surface water deliveries to the District landowners will result in greater groundwater draw down, both within and outside of the District. The lack of recharge and that subsequent draw down in groundwater levels will threaten the domestic water supply and quality to the El Nido community, and all the other unincorporated communities in the Merced Subbasin,	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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		which rely on individual domestic water wells. It will also affect the municipalities' and other community water districts' quality and quantity of water derived from groundwater wells. The SED states that it anticipates an average increase of 105,000 acre-feet of groundwater pumping as a substitute for the increase in unimpaired flows. Yet, at the same time, the State mandate's groundwater sustainability be achieved. And I believe that your Board is the enforcers for if the SGMA's deemed to have failed. The loss of recharge will significantly impact the Merced Subbasin's attempt to meet the requirements of SGMA to develop a workable GSP that will not require a massive fallowing of farmland, and the resulting economic damage to the local economy.	
821	2	This economic damage will be widespread and be felt throughout the subbasin. A damaged economy will also be reflected in greater damage to the social fabric of the communities in this area.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
821	3	The State Water Board should take attempts to improve salmon populations by encouraging cooperative partnerships, like the Merced SAFE Plan, rather than taking actions that leave much actual harm in their path, while gambling on results.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
822	1	My family, my employees, and I have one question for you today. How are we supposed to live our American dream if we lose 40 percent of the flows of water? We use this water to farm and provide jobs for the community. Your own studies show 1,103 salmon, and I know you disagree with that, would be saved from the 40 percent flow, at a cost of over 1,000 jobs, and in excess of $262 million to the Merced community. You're asking for 40 percent flows, but your own studies show, according to MID, 20 percent would have the same result.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
822	2	This last year, 1,950 Chinook salmon have returned to the Merced River Hatchery. Your flow targets have already been met.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
822	3	Our ranch is 15 miles south of Merced, in a small community called El Nido. Only a few hundred people live in El Nido, so our drinking water comes from the ground. Over the years, groundwater levels have been dropping and the problem's only been magnified from the drought. Groundwater levels have dropped below where pumps are set for many domestic wells. This causes a hardship for many people in the community, who do not have the tens of thousands of dollars to drill a new well.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
822	4	Another problem in our area is land subsidence. Land has been sinking six inches a year at my house, and a few miles to the south over a foot per year. Land subsidence in our area has made national news. I've been on tours with the subsidence with members of your own Board. Everyone understands it's a major issues and one of the reasons SGMA was put into law. I have a hard time comprehending how the Merced Subbasin would be able to support SGMA and support the loss of flows. You have to ask yourself at what cost is it to save the thousand salmon? One job per every salmon, at over $250,000 per fish? Is the ground going to sink six inches a year because we do not have surface water? The surface water helps	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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		recharge the groundwater basin and reduces the amount of groundwater used for irrigation. Has the Board even thought of the cost of subsidence and management? How are the housing communities going to be affected when homeowners start seeing cracks in their walls? Or, farmers see their casing crack on their wells and have to re-drill wells? Will there be any mitigation to help these costs? I do not want to see the salmon go extinct, but there is a better way of coming to a solution. Please support the Merced Irrigation District and try their SAFE Plan. We want to work together with you, but losing 40 percent of our flows is not working together.	
823	1	I'm the City Engineer for the City of Lathrop. And I'm to talk about the impact of the SED on municipal water supply and on the existing community in Lathrop. Most people in this room recognize that the California Environmental Quality Act is an arduous, exhaustive process. However, that CEQA process does have an end and upon final approval, projects can move forward to construction. About 14 years ago, armed with a final EIR, the Cities of Lathrop, Manteca, Escalon and Tracy funded, and SSGID constructed, a surface water treatment plant and 40 miles of pipeline, at a cost of about 140 million. My question is at what point in that process can an agency rely on water from a project that does have final environmental clearance? The Lathrop citizens are making payments on Lathrop's $44 million share of that facility. We're trying to understand how that water can be taken away without also taking away the debt that's already been incurred to deliver the water. Water payments are being made to bond holders and the collateral for that debt are the homes and business. The Unimpaired Flow Program really would force existing homeowners to pay, in addition to that existing water debt, to find another water source. And it's recommended that that be groundwater. Our issue is the groundwater basin in clearly limited in yield and that's exactly why Lathrop partnered to go into a surface water source to begin with. We're trying to understand the benefit. I'm being told that the state is estimating that this whole project could end up producing an extra 1,000 fish returning to the Stanislaus, Tuolumne, and Merced rivers. And I'm also hearing numbers about those extra fish costing between $40 and $400,000 a piece, depending on which computational method is used. So we've just got a real concern that the existing communities versus the hopeful benefits to fish are being completely -- that proportion has just been misunderstood and we'd like you to reconsider the approach.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
824	1	I challenge agriculture to do more to conserve the water they've got. And we can do more. I can do more, even though I've already done a lot. And I would like to say too that I haven't heard much mention today, although there's heaven knows mention of industrial. And of course I live in Silicon Valley where the computer industry runs through a lot of water.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
824	2	I'd just like to say that the earth changes. Life is change. Nothing is solid. People talk about water rights. Legally, that we may have water rights, but the earth doesn't give water rights. If you think that way, God doesn't give water rights. We have only the right to try to survive, using our wits, our determination and hopefully our cooperation. And I sincerely hope that that will be part of this process.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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825	1	I want to echo what I believe is a safe plan and a good plan, and urge you and thank you for listening to everyone. This is a passionate community of hardworking people. And as a Superintendent, I want you to look at it from the perspective of what these students mean and what this will do in terms of impacting how we fund, how we educate and how we lead.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
826	1	[The South Delta and Central Delta water agencies are] here because the SED proposes a number of changes. I won't go too far into this. The 0.7/1.0 is being proposed to change to a 1.0 standard and that depends on the time of the year, of course [ATT1:ATT1]. But this is supposed to be implemented by maintaining current conditions. And so the implementation of the change is still having 0.7 at Vernalis, so that nothing changes downstream [ATT1:ATT2]. And then of course the proposal also says that instead of measuring it--I'll ignore it for now--it's three locations in the south Delta we're going to measure stretches of river and then give you the averaged information. So South Delta's position is the proposed changes have no factual background and are not supported by the science [ATT1:ATT3]. And I think I can very clearly show you that, which may come as a surprise to you. But more importantly, the proposal to measure average ECs in the channels, and not at discrete locations, is a method by which we will ensure that there's never a violation. And I'll get on to that later, because when you average an area that has good water quality with areas that might have bad water quality, you never see the bad water quality and thus you don't know if you have a problem [ATT1:ATT4].	Please see Master Response 3.3, Southern Delta Water Quality, for responses to comments regarding why the southern Delta salinity objectives are being updated and regarding measurement of salinity in the southern Delta.
826	2	I think it is important to cover the background [ATT1:ATT5]. And of course it all goes back to the CVP's building of Friant Dam and it affects the water coming down the River [ATT1:ATT6]. The water from Friant is delivered to other places and then there is a decrease therefore in the San Joaquin River flows. And I don't think anybody disputes that, although there is a dispute about how much. And the CVP had a number of effects on the south Delta [ATT1:ATT7], of course, less water, more salt and lower water levels in the Delta, and changed flows. South Delta and what the Bureau was called for one year, the Water and Power Resources Service with the federal government, did a report in 1980 [ATT1:ATT8] to go over all these things and to see what those effects were, and how to quantify them. And so the Board has been presented this for the last 20 year, at least that I know of. But on this chart you can see in the bottom left I've circled a--made a box and then in the middle right, kind of. But the decrease in flows in the rivers are significant. And you can see that in the average of all years, it's 345,000 acre-feet decrease from April through September [ATT1:ATT9]. That's a huge amount. Of course in drier times it's different than that, but gives you a framework. Now this is one of the charts in that 1980 report also [ATT1:ATT10]. And it shows that over time the salinity in the river got worse. Now this is TDS on the left, not EC, so you've got to do the conversion. But as you can see, through the '50s the maximum TDS is always below the current standard. So I don't want people to think that we're better off now. We're certainly worse off now, virtually all the time. Of course, you have a flood time flow, that's a different thing.	The comment discusses southern Delta salinity, but does not raise a significant environmental issue with the SED. Please see Master Response 1.1, General Comments, for responses to comments that do not raise significant environmental issues or make a general comment regarding the plan amendments.
826	3	What this tells you is the amount of salt coming in the south Delta [ATT1:ATT11]. And you can see the numbers and it's mind-boggling. The mean average is 922,000 tons of salt coming down the river. Now you'll hear things from other people over different processes	The comment discusses southern Delta salinity, but does not raise a significant environmental issue with the SED. Please see Master Response 1.1, General Comments, for responses to comments that do not raise

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		that say well there are a lot of issues. The problem is these hundreds of thousands of tons of salt coming down the river, hundreds of thousands every year. Why is that an issue? Because the San Joaquin River water doesn't take that salt out to the Bay or ocean. When you have tidal inflows of a certain amount, and a San Joaquin River inflow of a lower amount, plus local consumptive use or evaporation, whatever that is, the San Joaquin River water then doesn't leave the area. That means you have hundreds of thousands of tons of salt not leaving the area. The only place it goes is applied to the land and either becoming drainage or groundwater or exported through the export pumps. The salt stays in our area [ATT1:ATT12].	significant environmental issues or make a general comment regarding the plan amendments.
826	4	The background of the regulations is important. They developed the current standard, the numbers 0.7 and 1.0 EC a long time ago [ATT1:ATT13]. They were working on the '70s and '80s, and of course, the 1995 Water Quality Control Plan adopted those numbers finally [ATT1:ATT14]. Now this is the page from the 1995 Plan, where it has the standards. And the only reasons it's important is that you can see for the Old River near Middle River and the Old River at Tracy Road there's a footnote 5. Footnote 5 says we should implement those two by December 31st, 1997. The text of the document says the same thing [ATT1:ATT15-ATT1:ATT16]. Well, the Water Quality Control Plan, as you know, is quasi-legislative, so we go into the water rights portion and then we come up with D-1641 [ATT1:ATT17]. D-1641, there's the same chart, same water quality standards, except footnote 5 now says something completely different. Mind you, we're well past the December 31st, 1997 deadline for implementing these, but footnote 5 now says well, the 0.7 standard will revert to 1.0 if somebody builds barriers or does something else [ATT1:ATT18]. Now that wasn't a topic. There wasn't the evidence. There wasn't any discussion. There wasn't any analysis of reverting the standard to something else once it was adopted. D-1641 was supposed to implement the standard. And that footnote allows it to be unimplemented. So of course lawsuits occurred, right? Everybody sued on D-1641, big mess, we got through it [ATT1:ATT19]. For our purposes, South Delta, the court said, as we argued, the water right portion of this process can't change the standard. You have to change it through a quasi-legislative process, the Water Quality Planning process. So the court said, "Go back. You either have to implement it or you have change it. You can't change it in your implementation." Now, your predecessors took that to say the court ordered us to change the water quality standard in the south Delta, which of course if absolutely false. The court said you have to do it in the right way if you want to do it. Mind you, as I said, there had been no information, no testimony, no cross-examination of anybody or any party that said, "That standard's too protective. It needs to be relaxed." There's none of that and yet the State Board then embarks upon a process to change the standard.	The comment discusses southern Delta salinity regulatory background, but does not raise a significant environmental issue with the SED. Please see Master Response 1.1, General Comments, for responses to comments that do not raise significant environmental issues or make a general comment regarding the plan amendments.
826	5	People submitted stuff along the way that said, "We have a new model that shows you don't need salt protection in the south Delta." Of course that's an overstatement, but a model means nothing if it's wrong, right? And we had some people say, "Well, you don't grow a lot of beans anymore, so you don't need to protect beans, so why should you have that standard?" That's the sum total of the evidence [ATT1:ATT20]. So what happens along the way? We have a Cease and Desist Order hearing against the Bureau and DWR, right [ATT1:ATT21]? I don't know if you remember that. And instead of implementing or	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues. In addition, please see Master Response 3.3, Southern Delta Water Quality, regarding water quality in the southern Delta, leaching fractions, yields, and the justification for amending the salinity objective in the plan amendments.

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		enforcing the standard the Board ordered the DWR and the Bureau to obviate future threats of violations. Now, I challenge anybody to put that into basic English and tell me what it means. Obviate future threats, it doesn't say, "Meet the standard." It says, "obviate future threats." So then we another CDO process, because the obviation didn't occur in time. And so we have a second CDO by the Board [ATT1:ATT22], which says, "Obviate the threat of non-compliance." Same thing, same mish-mash, wishy-washy, non-specific, non-enforcement of the standard. But this time you put a deadline in. And the absolute deadline was January 1st, 2013, which by my extremely educated mind means that it's already past. I was able to calculate that this passed 2013. So the standard was adopted, delayed implementation, never enforced, and kicked down the road constantly, based on the notion that it should be changed with no evidence, that it should be changed. Now we've presented local farmers' statements [ATT1:ATT23-ATT1:ATT24]. We had Chip Salmon who testified to the ongoing impacts, adverse impacts to grapes, beans and walnuts, he showed that. Rudy Mussi is here, who outlined his adverse impacts and the extra work he has to do to grow his almonds and grapes. And we have Mr. Richard Marchini, who confirms that he has walnuts right next to Chip's almonds, the same thing, they see the salt damage virtually every year [ATT3]. He's been impacted by it adversely. I've submitted Jack Alverez's statement, who says his crop yields are not the same between the area irrigated by poor south Delta water and the area irrigated by better San Joaquin River water upstream [ATT5]. And lastly we had Mark Bacchetti who's submitted a statement also talking about the potential damages, and his data showing over a 10-year period the salt in the soil is building up [ATT4].	
826	6	Neither the SED nor the Hoffman Report [ATT1:ATT25] includes any investigation about whether or not the gentlemen sitting over here or their compatriots actually are experiencing problems, because it assumes it's already too protective or protective. It's not protective right now especially since it's not being enforced. We don't know what 0.7 does to farmers in the south Delta, because we don't get to 0.7 in the south Delta. Now this is anecdotal, but I'll submit it in our testimony. I've measured, with the water master standing next to me, 2.1 EC at an intake. Now, if somebody thinks that we have 0.7 water in the south Delta throughout they're misinformed. We have horrible water quality in summertime especially and some times and other times. Anyway, the SED doesn't look to see, are people having crop loss now? We have calculations by Dr. Hoffman. Now why is Dr. Hoffman wrong [ATT1:ATT26]? Because I say so, that's not right. Dr. Hoffman was hired by you guys or your predecessors to investigate the salt tolerance of crops in the south Delta, so he had two reports. There was a draft and a final one we commented on [ATT1:ATT27]. Now I tried to boil this down, so it's easy to understand, not because the Board can't understand it but just because it's a simple thing. If you're in the laboratory and you build a box that's made of glass and you fill it with sand, and you put a plant in it, and you apply water you know the salinity of the water. And you measure the water that comes out the bottom and you know the salinity of that. And you say ah, salt either passed through the soil or it didn't, so you can determine what's collecting. Or you could dry out the soil and see what salt's left. That makes sense. That's perfectly logical. That doesn't work in south Delta lands, because we can't put a 20,000 acre box under the land and take all the water that only comes through the soil [ATT1:ATT28]. Dr. Hoffman	Please see Appendix E, Salt Tolerance of Crops in the Southern Sacramento-San Joaquin Delta, and Master Response 3.3, Southern Delta Water Quality, regarding the justification for amending the salinity objective. . Appendix E used the current state of knowledge on crop salt tolerance along with available input information such as leaching fraction, crops, and water quality from the Delta. Please see Chapter 11, Agricultural Resources, Section 11.4.2, Methods and Approach, and Impacts AG-1 through AG-4 for the analysis of potential impacts of salinity on crops in the southern Delta. Please see Master Response 3.3 for more information on leaching fraction and for information regarding the responsibility of the USBR and DWR relating to meeting Delta water quality standards. While the State Water Board has not conducted additional studies, other studies have been conducted, which the State Water Board has considered as part of its response to comments in the Final SED,

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		assumed the water quality put in. Of course you can't do that, right? If you say, "Well, they're using 0.7 water," which is what he did and I'll get to that, what if they're using 1.5? You have to know what they put on in order to determine whether the salt's leaching or not [ATT1:ATT29]. And so here we go. Here's one of Dr. Hoffman's charts [ATT1:ATT30]. There are others, which I'll address in my final comments. And this one you can see, in the caption there for Table 3.10 of his report assuming EC of applied water 0.7. Now again, this isn't the only thing in his report, but I'm just showing that he assumes one of the inputs. Now the rest of the chart shows you the other inputs, which is the salt out. Now this is tile drainage information from an area in the south Delta. And this shows you where those tile drains are [ATT1:ATT31]. Now, it's not a very good map, but you can kind of see that most of the south Delta ag is north of all these dots. All these dots are in the City of Tracy area and then just west of it, mostly in the west side irrigation. But it's tile drainage information. It's not bottom and end of the field what passed through the soil profile. So here's the problem. The tile drains in that area are collecting shallow groundwater of poor quality. So there's a lot of salt in it. So if you assume the input of salt, which is incorrect, and then your output of salt is vastly overstated what does your calculation of leaching mean? It means nothing [ATT1:ATT32]. Now, I'm not trying to be mean to Dr. Hoffman. He used the available information, but not his brain. You can't calculate leaching. You can't calculate the leaching fraction with the wrong input and the wrong output. That--how do you describe that? That's called logic. And you can have models. You can have calculations. You can have a computer. But the results can't violate logic, because logic means one follows from the other. And so Dr. Hoffman is simply wrong. Now he adjusted his report. He added a different leaching fraction to it. It doesn't matter what you do when your calculation is wrong. Now let me pose the question what on earth would you do if you can't calculate from that? Maybe you'd conduct a study. And by the way, Dr. Hoffman recommended, "Yeah, we need studies, because I'm just calculating this [ATT1:ATT33]."	
826	7	Why is salinity an important consideration in Delta agriculture or in agriculture in general [ATT2:ATT1]? Salt problems occur in approximately one-third of all irrigated land, so we know that there are issues in other parts of the world. We have similar issues. Maybe we just have other ways of dealing with some of those political issues that surround them. But certainly the salt issues are here and we have to deal with those on the ground.	Please see response to comment 826-7. This comment does not make a general comment about the plan amendments or raise significant environmental issues. No further response is required.
826	8	Parent material or rock weathers to form salts. We call those soils mineral soils. They're weathered from rock and sometimes those rocks will weather to ions that form salts. Also in agricultural systems some soil amendments that we add can add salts to the soil. Additionally, irrigation water will carry salts that get added to the soil. And then finally a shallow saline groundwater can influence the salinity condition of the soil. Now in the Delta, we have a few particularities that reflect that, but also add a little bit more to it. So in the Delta we have mineral soils, but we also have organic soils. And those are soils that are formed from decomposed plant material. The mineral soils that we have tend to be clay soils. And the organic soils are like clay soils in the sense that they're low permeability soils. It's difficult to [get] water to pass through those soils.	This comment is providing information regarding the characteristics of soils, irrigation water, and groundwater in the southern Delta. This comment does not make a general comment about the plan amendments or raise significant environmental issues. No further response is required.
826	9	Certainly irrigation water is carrying salts in the soil through the Delta and the Delta is at the end of the pipeline before the Bay. Another thing to consider is that in the Delta, we are--most growers are exclusively using surface water for their irrigation. They don't have	Please see response to comment 826-8.

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		groundwater to supplement. And then finally, as the groundwater is shallow we are also dealing with soils that are below sea level, so it just kind of adds to the hydrology or difficulty in hydrology in the Delta.	
826	10	So the effects of salinity on plant growth [ATT2:ATT2], I'm going to go over three general principals. The first is osmotic stress. This is the most common way that plants are stressed by salt conditions. And if you just think generally about a plant root growing in the soil, if that soil has high salinity then the plant has to translocate solutes into their roots in order to maintain a gradient from the soil to the root, of water. Otherwise, the plant becomes salt stressed. Now the thing about osmotic stress is that most of the time it's exhibited as generic stunting and so we may not recognize it as being a salinity stress. The second stress from salinity would be specific ion toxicity. So these are sodium, chloride and boron, primarily. These stresses in the picture, there you'll see a walnut tree with this browning along the leaf edges. These are dead plant cells and these cells are not able to photosynthesize and therefore those leaves are not as productive in providing for the plant. So again we see reduced productivity from those plants. And then finally plants are indirectly affected by degraded soil conditions. So in this case, you'll see some white crusting on the corner of that field. That white crusting, the salt in the soil result in poor infiltration, anaerobic conditions for the plant roots and therefore the plants aren't growing productively.	This comment provides information regarding effects of salinity on plant growth. Please see response to comment 826-8.
826	11	Leaching is the primary management strategy for salinity [ATT2:ATT3]. And leaching must be practiced when soil salinity has the potential to impact yield. Leaching occurs when water's applied in excess of soil moisture depletion, by crop evapotranspiration, or the evaporation of water from the soil, and the transpiration of water from the plants. Leaching may occur during the rainy season or whenever an irrigation season event occurs. However, in my data I'm going to show that there has not been any leaching in the soils where I did my studies, between the spring and the fall. So we're not getting any sort of leaching during the irrigation season. I'll be talking about the leaching fractions, so to define the leaching fraction, this is the amount of total applied water that passes below the root zone. In agricultural systems we think about a 15 percent leaching fraction as being a general rule of thumb. And this 15 percent leaching fraction, that is assumed in the crop salinity tolerances that we use in the academic world to assess whether a condition is going to impact crop yield. So the purpose of my study was to gain an understanding for the leaching fractions that are being achieved in the south Delta. I used alfalfa as my model crop, because it's a perennial crop that grows over four years, sometimes more [ATT2:ATT4]. And why that's important is because there are certain agronomic practices we have to consider when you've got a perennial crop and we're not rotating. So on a year-to-year basis we can't do certain management practices at the end of the season that they may be able to do after say a tomato crop that's been harvested and rotated out.	This comment provides information on management strategies related to salinity in the southern Delta. Please see response to comment 826-8.
826	12	We selected, in cooperation with South Delta, seven sites that were located throughout the south Delta, again in cooperation with the growers [ATT2:ATT4]. I have not identified those sites on a map for the purpose of the privacy of the cooperators, recognizing that's what their wishes were. But I have identified the water source where those fields were getting their water from. And so if you were to place those on a map, I think you would see that	This comment describes a study provided by the commenter. Please see response to comment 826-8.

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		those sites are located throughout the south Delta. I've also named in this slide the different soil series. There's three different soil series named that were of interest to us. And those three soil series represent about a third of the irrigated land in the south Delta. So I would say that the results that we have from this study are pretty representative of the agricultural lands in the south Delta.	
826	13	This slide gets to the leaching fractions right away [ATT2:ATT6]. And then the next few slides will show the salinity of the soil profiles in a graphical sense. So first off, you notice that there's a column for the ECe. This is the soil salinity, the saturated paste extract. This is how we test the soil. We go out to the field. We bring back the soil to the laboratory and then we test it for the electrical conductivity. And I will say now I'll be representing EC as deciSiemens per meter. This is a unit that's equivalent to the millimhos per centimeter that's been named previously in the hearing. So the ECe is listed in the column there. This is the ECe of the soil at the base of the root zone. This is the layer of soil where the salinity is the highest and this is where we calculate the leaching fraction from. But then the next column over names the ECw, this is the salinity of the irrigation water. I collected the irrigation water from each field, each time the soil was being irrigated. So this is a seasonal average of maybe six, seven, eight irrigations depending on how many times the grower was irrigating over the season. Results in 2013 are on the left side of the table and 2014 on the right. You'll notice that there are three sites where the irrigation water salinity average, over the season, was higher than the 0.7 salinity objective. We used that number, we used both of those numbers in our leaching fraction calculation, and we find that the leaching fraction that we achieved in these soils was pretty low at most of the sites. At only two of those sites did we have a leaching fraction that exceeded [the] 15 percent rule of thumb. Most of these sites had leaching fractions well below that. I'm going to talk specifically about four of those sites. So the first one is Site 1; this is a silty clay loam soil [ATT2:ATT7]. Again, to remind you from the previous slide, the ECw over the course of the irrigation seasons, in both seasons, was 0.54. So the crop salinity tolerances that are set up for alfalfa would be a 1.3 EC for the irrigation water. So we've met that. We're not reaching the threshold where we would expect to see crop yield declines for the water. However, the threshold for soil in the peer-reviewed literature is 2.0. And you'll notice in this slide, the top foot of soil, or the top 30 centimeters, we're at that 2.0 deciSiemens per meter. And as we get lower into the soil profile we get even higher than that, so that our average soil profile salinity is much higher than 2.0. Using our crop salinity tolerances we would expect to see yield declines. For every one deciSiemen per meter increase in salinity, we would expect to see an 8 percent yield decline for each increase above that threshold. So in this case, we're much above the threshold of 2.0. Our soil salinity is increasing from spring to fall. Spring is indicated in the green lines and the fall in the orange lines. So we see that those orange lines are to the right of the green lines, we are not able to get leaching over the course of the season. And the other thing I would like to point out is that there are some points that are on their own that are not connected by lines. Those represent the groundwater depth and the salinity of the groundwater. And at this particular site I think an interesting point is that the	The comment is summarizing the results of a study conducted in the southern Delta. Please see response to comment 826-8. In addition, please see Master Response 3.3, Southern Delta Water Quality, for information on leaching fraction, including "The Leaching Fractions Achieved in South Delta Soils under Alfalfa Culture, Project Report Update December 2016," by Dr. Leinfelder-Miles, water quality, and yield.

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		spring groundwater is at that depth where you see the highest salinity. So this would tell me that the groundwater depth is impairing the leaching of salts below that depth. These two graphics [ATT2:ATT8] are kind of squished together, but I did that for a reason, because these two fields represent some of the highest salinity that I saw over the course of the study and the lowest salinity. Both are the same soil type, a silty clay loam. The electrical conductivity of the water at the Site Number 2, the graph on the top, was a little bit higher, 0.7 to 0.8 over the course of the two seasons, 2013 and 2014. And the bottom slide, we had slightly better water quality, 0.4 to 0.57. So what would be my explanation for such a drastic difference in electrical conduct to soil salinity? My explanation for this is that while we do have better water quality in Site Number 3 it is probably more of an observation I made by visiting that field. I think we were getting higher leaching in this field, which was represented by the leaching fraction Site Number 3. We're getting higher leaching in this field because the grower's applying more water. That water is sitting on the field and again my observation is that that field was a very poor stand. The weeds were coming up through that field more than the alfalfa plants. The yields were declining and the grower pulled out the field, ripped it up, and planted a new crop at the end of 2014, which there aren't results for the spring of 2015 for this particular field. That's an observational thing, but the growers who grow alfalfa would tell you that you can't have weeds growing up through your alfalfa crop. It lowers your hay quality and it can be a danger to the animals. This particular site was interesting to me [ATT2:ATT9]. It had some of the highest salinity applied to it yet not the highest salinity in the soil. This is a different soil type however, it's a fine sandy loam. It's got better water infiltration, because of the different soil texture and I think we were able to leach the salts much better indicated by the higher leaching 1 fraction. I'll go through the yield results very quickly. We did see--these are not yields that I collected from the growers. These were me going out and using my own procedures of a quadratic yield analysis, cutting a square of alfalfa at various places in the field. We do see yield declines from 2013 to 2014 [ATT2:ATT10]. In a report that I've written up on this project I wrote that I could not correlate salinity and yield. The reason that I said that is because this was not a controlled replicated experiment. In a controlled replicated experiment where you've controlled for other sources of variability, it's much easier to set up a correlation between the factor that you are interested in, your treatment, and something else, say yield, because you've controlled for other sources of variability in your experiment. This was a survey project where I wasn't controlling anything. I was interested in the quality of the water and the quality of the soil as it relates to salinity. So I could not make that generalization, that correlation between yield and salt. It doesn't mean that it's not there. It just means statistically I can't tease it out. So to conclude, salinity is a problem in the Delta, because of some of these inherent conditions. And some of these inherent conditions cannot be managed by the growers. The growers are dealing with unique growing conditions and using best management practices they have constraints that limit their ability to leach salts. And so if salinity changes, if salinity objectives get more lax, then they're going to be dealing with salinity beyond what they're already dealing with under the current objectives.	

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826	14	The issue that I'll cover is this averaging of ECs in the channels [ATT3:ATT36]. The SED proposes that instead of measuring at Vernalis, Brandt Bridge on the San Joaquin, Middle River and Old River and Old River at Tracy Boulevard Bridge that we now examine reaches of channels, not just locations. So the first one's Vernalis to Brandt Bridge and I have a map coming up [ATT3:ATT37]. Then we have the Middle River from Old River to Victoria Canal. And Old River/Grant Line from the head of Old River to West Canal. Now the problem is if you're trying to find out where or if you have problems in the south Delta, or if you can enforce a standard in the south Delta and you don't examine locations, but you examine averages over reaches, you will never see the higher numbers. That's just by definition if you're going to average. You will make sure that you never see the high numbers, and so you don't know that there's a problem. Now this isn't some sort of random mistake. Vernalis to Brandt Bridge includes a large stretch of the good water quality from the Stanislaus River used to dilute. So if you average 0.5 or 0.6 or even 0.7, because that's what they're maintaining, then if you reach 1.0 or 1.2 somewhere down by Brandt Bridge you will never see that number. You'll see that the average says we're okay even though half of the area might be above the standard. Similarly, if you measure a reach from Middle River, down Middle River to Victoria Canal, Victoria Canal is export quality water that crossed out Delta flow. And so that water might be 0.4 or 0.3 EC. And if you average that with some water that up at the head near of Middle River and that's--I'll just make up a number--if that's 1.1, you'll never see that there is any violation anywhere in that standard. Same thing with the final reach, which is the head of Old River down through Old River over to the export pumps. Now the export pumps are holding export pump water. So if you've got a bad spot in the middle, which is our worst spot right here at the bottom here at the lowest point of Old River, that doesn't show up when you do the averages. It's gone. And so if your method of measuring compliance of a standard is to never see the maximum amount of salt in any particular channel, you will never see a violation. The 2006 Update of the Water Quality Control Plan says in black and white that these [salinity] standards apply throughout the channels. And so whether or not a measurement point is a good reflection of what's going on all over, it's supposed to be applied throughout the channels. Now we may not be able to do that, right? I mean, some things may be impossible. But when you start averaging these numbers, you insure that you will never see a violation. And that's a problem with the compliance program and a monitoring program if it's constituted so you'll never have a problem. And that's what this [SED] is constituted to do. There's no other explanation, because it doesn't recommend additional monitoring compliance points to find where are the bad parts. It doesn't say we should change the compliance locations to different places that are better reflective of what's going on. It says let's average good water and bad water quality all over the south Delta.	Please see Master Response 3.3, Southern Delta Water Quality, for responses to comments regarding the measurement of salinity in the southern Delta. Please note that the specific monitoring locations and procedures will be developed through the Comprehensive Operations Plan and Monitoring and Report Plan to be prepared by DWR and USBR.
826	15	[JOHN HERRICK:] So what are the [south Delta salinity] solutions [ATT1:ATT39]? Everybody hates John Herrick and the south Delta, because we're the people who don't do anything and we oppose everything and we're bad, evil people. Whether that's true or not, there are solutions. And you've been told for 15 years there's nothing can be done in south Delta.	Due to concern regarding the impact that the permanent operable barriers project may have on migratory fish, additional studies are being conducted prior to the re-initiation of consultation for Endangered Species Act permits required for the project. Consequently, it is the State Water Board's understanding that DWR has indefinitely postponed implementation of the project. Other potential methods for controlling salinity in the southern Delta, such as timed inflows and coordination of barrier operations, may be explored in the

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		Wrong, right? Now, I've been saying to other people without the hammer, you're not going to get anything done. So if you say, "I don't know what to do," nothing will get done. But if you have a hammer then the Department of Water Resources, the Bureau will mystically find ways to discuss things with south Delta and try new programs. So what can we do? Well, of course the permanent barriers are always something. The permanent barriers aren't in because some--excuse my expression-- some idiots at the fishery agencies don't understand the flows of the Delta. Now that's a long explanation that I won't go into-- CHAIR MARCUS: That doesn't really help sell the point. MR. HERRICK: It doesn't. It doesn't, but it's true, because we argue with these people. That they say the barrier results in fish being killed, they don't want to do that. A fish that goes upstream of a barrier lives. A fish that stays downstream of the barrier gets killed by the export pumps. That's the hydraulics of the area. Now again, I was being snotty there and I shouldn't be, but-- CHAIR MARCUS: It just detracts from your valid points. MR. HERRICK: I understand, but I am what I am, sorry. (Laughter.) Anyway, the barriers are just a political decision that somebody said, "Okay. Well, we'll cooperate on doing something else, but we don't want you to put barriers in, because we don't know how they affect things." That's wrong. We can still do that. Now timed inflows, there are actually people upstream that have approached me and said, "You know we may be able to isolate a bunch of water that could be released for your benefit." That's a good thing. Now we have to investigate how to do that, but if you have a chunk of water or chunks of water that you can release at certain times you might coordinate things and flush out a portion. It doesn't cure the area permanently, but you might flush something out and better things. And similarly you could coordinate barrier operations. And we might be even willing to have a barrier opened up or culverts opened up so that people can't irrigate for a couple of days if that flushes the channel out. We might be able to do that. That's a coordination thing that I might be able to do. Now I don't want the farmers to shoot me for proposing that.	Comprehensive Operations Plan to be developed by DWR and USBR. Please see Master Response 3.3, Southern Delta Water Quality, for discussion of the Comprehensive Operations Plan.
826	16	The other thing is pumps. We could do a test to see, let's see if you do add 250 CFS extra water flowing in one direction, let's see what happens. Instead, we have a report by DWR that says, "If we add 1,000 CFS flow into Old River it won't meet the standards all the time." That's of course wrong. The tidal flow up the river is about 800 or a 1,000 CFS. If you doubled that it's either going to flood the land or it's going to move the salt somewhere else, right? Those are the only two possibilities. So we need to conduct that test and you could order some tests like that. Now, of course there's always a combination of things where you do this and do that. DWR has a study where the guy recommended, "Let's do one operable barrier. We could make it cheap, but we could do things." We can do things to address this. It's a simple problem. Net flows, if you have a channel that has net flows through it you can have some sort of maintenance of water quality. If you have a channel that doesn't have a net flow, like I showed you at the very beginning, you cannot maintain salt. We can do this. But we've had	The use of low-lift pumps to help control southern Delta salinity is discussed in Chapter 16, Evaluation of Other Indirect and Additional Actions.

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		almost 20 years of a lack of effort to address it. That's not your lack of effort, but the projects had no incentive to try to figure this out. If it cost $10 billion, we can't do it. But that doesn't mean we can't try to figure out what'll work.	
826	17	[ATT2: Leaching Fractions Achieved in South Delta Soils under Alfalfa Culture. By Michelle Leinfelder-Miles.]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	18	[ATT2:ATT1: Why is salinity an important consideration in (Delta) agriculure?]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	19	[ATT2:ATT2: Effects of Salinity on Plant Growth]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	20	[ATT2:ATT3: Leaching is the Primary Management Strategy for Salinity]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	21	[ATT2:ATT4: Research Project: Leaching Fractions Achieved in South Delta Soils under Alfalfa Culture (2013-2015)]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	22	[ATT2:ATT5: Map of Sacramento, San Joaquin, and Mokelumne]	The commenter is providing this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	23	[ATT2:ATT6: Results of Salinity Tests]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	24	[ATT2:ATT7: Results: Soil Salinity-Site 1-Silty Clay Loam]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	25	[ATT2:ATT8: Site 2 and Site 3-Silty Clay Loam]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	26	[ATT2:ATT9: Results: Soil Salinity-Site 5-Fine Sandy Loam]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	27	[ATT2:ATT10: Results 2013 and 2014]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	28	[ATT2:ATT11: Conclusions]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	29	[ATT1: South Delta Water Agency Opposition to SED Proposed Changes to Salinity Standards]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	30	[ATT1:ATT1: First Substitute Environmental Document released by SWRCB late 2012]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	31	[ATT1:ATT2: The SED concludes]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	32	[ATT1:ATT3: The proposed changes to the southern Delta salinity standards have no factual background and are not supported by the science in the SED.]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.

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Ltr#	**Cmt#**	**Comment**	**Response**
826	33	[ATT1:ATT4: Problem: Each of the reaches contains areas of good water quality, which means that bhe average will hide the areas (and instances) of bad water quality.]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	34	[ATT1:ATT5: Presentation Summary]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	35	[ATT1:ATT6: In the late 1940s through the 1950s, the Unisted States Bureau of Reclamation built and began operating the Central Valley Project.]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	36	[ATT1:ATT7: The CVP had a number of effects on the San Joaquin River and southern Delta.]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	37	[ATT1:ATT8: CVP effects report, June 1980.]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	38	[ATT1:ATT9: Table V-18 from 1980 report]	The commenter is providing this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	39	[ATT1:ATT10: Figure VI-25 from 1980 report]	The commenter is providing this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	40	[ATT1:ATT11: Table 3. Annual salt load from mass emissions and Delta exports through the Sacramento-San Joaquin Delta system.]	The commenter is providing this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	41	[ATT1:ATT12: Why do salts collect in south Delta channels?]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	42	[ATT1:ATT13: Background/History of Regulatory Efforts]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	43	[ATT1:ATT14: In the 1970s and 1980s, the SWRCB in conjunction with stakeholders developed water quality objectives]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	44	[ATT1:ATT15: Page from 1995 Bay-Delta WQCP]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	45	[ATT1:ATT16: Page from 1995 Bay-Delta WQCP]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	46	[ATT1:ATT17: The 1995 Water Quality Control Plan was a quasi-legislative process by he SWRCB.]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	47	[ATT1:ATT18: Page from D-1641]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	48	[ATT1:ATT19: D-1641 was challenged in numerous lawsuits.]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	49	[ATT1:ATT20: The 1995 Water Quality Control Plan contained no references or statements that the salinity standards in the southern Delta were somehow in question or overly protective.]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.

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Ltr#	**Cmt#**	**Comment**	**Response**
826	50	[ATT1:ATT21: Cease and Desist hearing held by SWRCB against DWR and USBR 2006]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	51	[ATT1:ATT22: Cease and Desist hearing held by SWRCB against DWR and USBR 2010]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	52	[ATT1:ATT23: Local Farmers' Testimony of Current Adverse Impacts]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	53	[ATT1:ATT24: Letters of support from farmers]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	54	[ATT1:ATT25: Neither SED nor Hoffman Report include any investigation or data on additional management practices needed, crop damages, or decreased yields.]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	55	[ATT1:ATT26: Errors Committed in Hoffman Report]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	56	[ATT1:ATT28: Hoffman approach: measure salt in and salt out to determine leaching fraction]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	57	[ATT1:ATT29: Problem: Hoffman used assumed applied water salinity for "salt in" and tile drain data for "salt out."]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	58	[ATT1:ATT30: Table 3.10 from Hoffman report]	The commenter is providing this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	59	[ATT1:ATT31: Figure 3.18 from Hoffman report]	The commenter is providing this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	60	[ATT1:ATT32: Problem continued]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	61	[ATT1:ATT27: SWRCB hires Dr. Glenn Hoffman to review crop salt tolerances in the southern Delta.]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	62	[ATT1:ATT33: Thus by observing lots of "salt out" Hoffman concluded adequate leaching was occurring.]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	63	[ATT1:ATT34: SWDA commissioned a study to actually test the "salt in" and "salt out"]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	64	[ATT1:ATT35: Leaching study results by Michelle Leinfelder-Miles]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	65	[ATT1:ATT36: Effects of Averaging ECs in Channels]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	66	[ATT1:ATT37: Proposed three channel reaches for measuring compliance of 1.0 EC standard]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.

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826	67	[ATT1:ATT38: Solutions]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	68	[ATT1:ATT39: Solutions Defined]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	69	[ATT1:ATT.5: Background/History of Salt Problem]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	70	[ATT3: Statement of Richard Marchini]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	71	[ATT3:ATT1: Map of Richard Marchini's Union Island walnut ranch area]	The commenter is providing this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	72	[ATT3:ATT2: Map of Richard Marchini's Roberts Island walnut ranch area]	The commenter is providing this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	73	[ATT4: Statement of Marck Bacchetti]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	74	[ATT4:ATT1: Marca Bella Farms grid sampling report]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	75	[ATT4:ATT2: Del Terra Farms report of grid soil analysis]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
826	76	[ATT5: Statement of Jack Alvarez]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
827	1	This is the Atwater FFA Organization. And we'd just like to take the time to thank you all for allowing us to witness such an educational Board meeting and an issue facing California agriculture and the water that's sustaining our educational programs. We'd just like to thank you for allowing us to witness this, as well as the educational knowledge that we're going to go ahead and take back and take into our agriculture education programs, which is one of the most influential here, not only throughout our valley but throughout our entire state.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
828	1	The proposed flows are not just about fish. It's about ecosystems. We know that salmon are a keystone ecological species, whose presence and abundance are critical to the health of ecosystems throughout the State. By protecting our salmon, we revitalized ecosystems throughout huge portions of California. There is strong scientific evidence that changes to the timing and amount of flow have been the most important factor leading to the decline of Delta River ecosystems. Certainly, many other problems need to be addressed to restore the health of these ecosystems. But we cannot forget that flows are the single most important management tool that we have for their protection. Throughout the day we've heard numerous speakers reference the 1,100 salmon number. Your staff has addressed it. I want to reiterate that this talking point is inaccurate and	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues. Please see Master Response 2.1, Amendments to the Water Quality Control Plan, regarding the salmon doubling goal. Please see Master Response 3.1, Fish Protection, regarding SalSim limitations.

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		misleading. The SalSim model that produced this number is an extremely limited scientific model. It was not designed to forecast future salmon population levels. That's made clear in the preface and in the SED. What we do know, through scientific consensus, is that increased flows will increase salmon populations throughout our rivers. I would like to make two recommendations, with my limited time, and then one contradictory recommendation. First, I would like to see you increase the upper range of the flow to 60 percent. The scientific consensus that says that only 60 percent will revitalize these salmon populations. I think that should be within our toolkit and the water management portfolio to allow water managers to use that level of flow to see if we can bring back salmon levels. Secondly, I'd like to see the SED directly reference the salmon doubling goals. It's an exacting law. I think the SED should comply with it. I think it should be built into the SED, itself.	
828	2	Throughout the day, I've been really moved by the representatives of the agricultural community. And as I've listened, I came here to really speak on behalf of the salmon. But I think what I'm walking away with is a deep desire for us to try and do both, which I know is your ultimate goal. But whatever we do to improve the habitat for our ecosystems in California, I really don't want it to screw over communities like here, in Merced. We have the ability, the technology, the know how in our State to do both. And I really don't want to see a community, like Merced, turn to dust in the name of salmon. I think we can do both.	Please refer to Master Response 1.1, General Comments, and Master Response 2.1, Water Quality Control Planning Process, regarding the consideration of competing beneficial uses including agriculture, and fish and wildlife.
829	1	I completely agree with the MID SAFE propositioned program as presented this morning. I think it's a viable answer to all of our problems. I just wanted to express that to you.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
830	1	Jeff Marquis, Le Grand, California, a Merced Irrigation District Board Member, lifelong resident of Le Grand, third generation farmer, here with my father, my son Nick. We're in full agreement with everything you've heard today in regards to the passion and the concerns of our communities and our water that our forefathers fought so hard to construct, build, and distribute throughout the county.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
831	1	I've been a member of the Merced County Board of Supervisors for 26 years, representing the west side of Merced County. I have seen the good days, as well as the economic downturns and their effect on our way of life. I can assure you that if this proposal is implemented as proposed, we have seen nothing yet that will compare to the devastation which will occur due to the loss of jobs and the social and economic damage that will be done here in the Central Valley.	Please see Master Response 1.1, General Comments, acknowledging the concerns of elected representatives and other community members and for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues. For a more detailed discussion of economic impacts please refer to Master Response 8.0 Economic Analysis Framework, and Master Response 8.4, Non-Agricultural Economic Considerations.
831	2	I have seen and recognized that the State Board continues to struggle to reverse the declines in fish population in the Bay-Delta, which is a worthy struggle that truly deserves a balanced approach. I am very concerned about the proposed taking of water from families and communities here in Merced County for the fisheries in the Delta. Merced County and its irrigation districts have been proactive in working with the communities to improve local management of groundwater and its sustainability.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues. For further discussion regarding the consideration of beneficial uses please see Master Response 1.1 and Master Response 1.2, Water Quality Control Planning Process. Please refer to Master Response 3.4, Groundwater and the Sustainable Groundwater Management Act, for a discussion of SGMA and local management of groundwater. Please also refer to Master Response 2.7, Disadvantaged Communities, and Master Response 3.6, Service Providers, for additional information on community water supply and groundwater issues in the

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Ltr#	**Cmt#**	**Comment**	**Response**
			plan area.
831	3	In addition, the recent passage of the Sustainable Groundwater Management Act adds the state mandate for sustainability. The proposed taking of our water supplies for flows in the Delta certainly makes sustainability impossible on the east side of our county and threatens the viability of all of our communities.	The State Water Board acknowledges that it will be challenging, but implementation of the plan amendments does not conflict with SGMA; together they allow for true integrated planning of California's scarce water resources, one that does not trade impacts between surface and groundwater. It will be up to local entities to determine the precise actions that would be taken in response to implementation of the plan amendments, with or without the future condition of SGMA. For further discussion on this issue, please see Master Response 3.4, Groundwater Resources and the Sustainable Groundwater Management Act.
831	4	It might be easier to accept if the plan to throw more water at the Delta had worked in the past. It is time to recognize that water in the Delta alone does not work. Until the state process is widened to look and solve the other issues in the Delta, such as predation, invasive species and in-Delta pollutants, it will continue to fail the fish and wildlife, while threatening the viabilities of families and communities here in Merced County. I thank you. And I certainly hope that you will take additional time to evaluate what is being proposed and make appropriate and necessary changes.	Please refer to Master Response 3.1, Fish Protection for additional information regarding the scientific justification for the LSRJ flow objective.
832	1	The purpose of this hearing, obviously, is to let you know the impact to our communities. This hearing is a first afford in that effort. But let me tell you, and I'm sure you've gotten a clear sense of it this morning, I'm reminded of the movie Network in 1976 when the quote came, "I'm mad as hell and I'm not going to take it anymore." That's what you feel back here. Folks are mad as hell and they don't want to take it any more. This incremental reallocation of water that, for my purposes, goes back to 1992 with the Central Valley Improvement Act, and then again in 2006 with the San Joaquin River Restoration Act. And now with this proposal, we are looking at a potential of 1.5 million acre-feet of water on an annual basis, depending upon the rainfall and the snow, that has been reallocated. The 800 to 1.2 million acre-feet as a result of CVPIA reform, and the 225,000 acre-feet of water as a result of the San Joaquin River Restoration Act. And this proposal, if we add it up with the Merced, the Tuolumne and the Stanislaus, could be another 293,000 acre-feet of water. So that's how I get to 1.5. It's really easy for some folks who, if it's not your water, to say, well, these are good purposes and we want to reallocate it. But when it's your life and blood, 1.5 million acre-feet of water -- and if the fisheries had improved over the last 20 years, you could at least have something to point to. But the fact is, as you know and this Board knows, there are multiple contributing factors that are resulting to the decline of this system. I mean, we have a broken water system. Let's face it, this water system that was devised and conceived in the '40s and the '50s to provide for a population of 20 million people and the agriculture that we had in the 1960s is no longer capable of meeting all of the demands and needs of a state that has 41 million people today, will have 50 million people by the year 2030, and is the largest agriculture-producing state in the entire nature, that produces half of our fruits and vegetables, number one in citrus, number one in dairy, number one -- you go down the list, 300 commodities, $20.4 billion in exports last year, California alone. And so we have to determine this balancing act.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues. The commenter makes reference to issues that are beyond the scope of these plan amendments; please see Master Response 1.1 for a description of the plan amendments. And, for further discussion regarding the consideration of beneficial uses in the water quality control planning process, please see Master Response 1.1 and Master Response 1.2, Water Quality Control Planning Process.
832	2	The proposal before us that the staff has come out with, in my opinion, is an incredibly unbalanced and in direct conflict with the multiple priorities of State Water Law that0 include the following. Sustainable Groundwater Management Act, passed and signed into law, now almost two years ago. We have to come into compliance soon with that. Now you're talking about	The State Water Board acknowledges that it will be challenging, but implementation of the plan amendments does not conflict with SGMA; together they allow for integrated planning of scarce water resources that does not trade impacts between surface and groundwater. For further discussion on this issue, please see Master Response 3.4, Groundwater Resources and the Sustainable Groundwater Management Act.

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		taking 293,000 acre-feet of water away, and we've still got to try to come into compliance with that. I don't think that's reasonable.	
832	3	The concept of co-equal goals, co-equal goals, you know, I've been part of this effort for a long time. I remember, we were all supposed to get healthy together again. Well, this part of the valley, our San Joaquin Valley, is not getting healthy if we continue to reallocate the precious water supply that is so desperately needed here. The direct identified impacts in the proposal, we believe, is over $260 million overall, $68 million for agriculture in identified benefits for a population of approximately 1,100 Chinook salmon. Now, I know you said earlier, that a range. Okay. But the fact of the matter is, is we've got 600,000 to 800,000 salmon on a roughly estimated basis. And it's not determined that these are endangered. So I think we've got to look at the co-equal goals when we're talking about this. The amounts of $260 million impact for a population increase of less than two-tenths of a percent is4 approximately $235,720.76 per fish, to my math. And that's at the lower population level. These salmon are not at risk, and they still are commercially harvested. And I am simpatico with the salmon fisherman. They've had tough times, as well, but we've had tough times here. We've had zero water allocation in parts of this valley in consecutive years in a row. We have a five percent water allocation on the west side. I'm talking to a Los Angeles Time reporter last spring. He says, "So you're trying to get your farmers more water; right?" I said, "No. Wrong." He said, "What do you mean?" I said, "I'm trying to get our farmers some water. When you have a zero allocation, that's no water." He says, "I don't get it." I said, "Where are you from?" He says, "Well, I'm from Miami, originally. I'm just new to the L.A. Times." That's part of the problem. We have a challenge in communication. We have two-and-a- half percent of the state's population directly responsible for this incredible agricultural production. My family, like many of these families here today, have farmed for generations. And so the fact of the matter is, is that we can see what happened, that is the west side of the valley, when an imbalance of regulatory requirements takes place. The State Water Board, and I respect your due diligence, has a charge to weigh the balance in competing beneficial uses. And this is, I think, an incredibly imbalanced proposal that the Board has come up with. But Chairperson Marcus, you and I have known each other for a long time. And I was hopeful that recently at a Board hearing in Sacramento, you had a quote, and let me repeat your quote. I want to make sure I got it right. You said,	Please see Master Response 1.1, General Comments, and Master Response 1.2, Water Quality Control Planning Process, regarding the State Water Board's consideration of beneficial uses within the context of the water quality control planning process. Please see Master Response 2.1, Amendments to the Water Quality Control Plan, for information on flow as a "master variable" in the health of a river system. Please also see Master Response 3.1, Fish Protection, for information on the measurable benefits to aquatic resources from the plan amendments and responses to comments regarding the number of fish the project will produce.

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		"The State Water Board must adopt objectives that reasonably protect beneficial uses and consider and balance all the beneficial uses of water, and not pick one and discard the others," Marcus said. She described river flow as a key factor in survival fish, including salmon, but noted, "There are other important factors, including effecting the fisheries, such as degraded habitat, high water temperatures and deprecation," end of quote. Did I get that right? CHAIR MARCUS: Yeah. CONGRESSMAN COSTA: Good. There are numerous factors impacting our fisheries, and it's taken this long to take people to finally begin to become aware of them.	
832	4	We had a bit of a success in the last ten days on important water legislation effecting California, to try to further provide balance. I know that Merced Irrigation District has spent months working with the proposed alternative that represents a multi-prong approach to improving salmon habitat and addresses predation issues. I ask you seriously to look at the Merced Irrigation District proposal because I think, instead of a flawed proposal that only advances one effort and exacerbates, I think, false choices between fishery improvements and community farms, between flows for farmers and flows for fish, the truth is, is that we can all move forward together if we address the many stressors, multiple stressors that are impacting our state's fisheries. But we must be willing to explore alternatives to approach the ones, like the one developed by the Merced Irrigation District, and the likes of the Delta Smelt Resilience Plan advanced by the California Department of Fish and Game. These are types of proposals that meet the Board's charges of balancing the competing needs. These are the types of proposals that do not double unimpaired flows and expend nearly a quarter of a billion dollars for 1,100 fish.	Please see Master Response 2.4, Alternatives to the Water Quality Control Plan Amendments, regarding information about the S.A.F.E. plan. Please see Master Response 1.2, Water Quality Control Planning Process, regarding consideration of beneficial uses. Please see Master Response 8.0, Economic Analyses Framework and Assessment Tools, and Master Response 8.4, Non-Agricultural Economic Considerations, regarding ecosystem benefits and the economic considerations associated with the analyses contained in the SED (Chapter 20, Economic Analyses). As discussed in the Chapter 19, Analyses of Benefits to Native Fish Populations from Increased Flow between February 1 and June 30 (Section 19.4, SalSIM), this modeling tool back casts how salmon populations may have been different in the past (1994-2010) if water management was different in the three east-side tributaries. Please Master Response 3.1, Fish Protection, which addresses the mischaracterization in comments of the SalSIM model as a predictive tool. The Delta Smelt Resilience Plan would not be considered an appropriate alternative to the plan amendments because it would not meet the plan amendment purposes and goals identified in Chapter 3, Alternatives Description, which are to: • Provide flows that more closely mimic the natural hydrographic conditions (including frequency, timing, magnitude, and duration of natural flows) in the LSJR and three eastside, salmon-bearing tributaries—the Stanislaus, Tuolumne, and Merced Rivers—to which these migratory native fish species are adapted; • Provide flows in a quantity necessary to achieve functions essential to native fishes such as increased floodplain inundation, improved temperature conditions, improved migratory conditions, and promote other conditions that favor native fishes over nonnative fishes; • Promote transparency in decision-making and provide certainty to the regulated community by expressing flow requirements for the protection of fish and wildlife as a share of the total quantity of water available for all beneficial uses; and • In establishing flow water quality objectives to reasonably protect fish and wildlife, take into consideration all of the demands being made and to be made on waters in the LSJR and the three eastside, salmon-bearing tributaries and the factors to be considered for establishing water quality objectives in Water Code Section 13241, including, but not limited to, past, present, and probable future beneficial uses and economic considerations. This is because the Resiliency Plan is specific to Delta Smelt and does not extend geographically into the three eastside tributaries. It is also because the Resiliency Plan is not a water quality control plan, which would establish water quality objectives and consider beneficial uses that rely on the water quality.

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Ltr#	**Cmt#**	**Comment**	**Response**
			The comment does not raise significant environmental issues.
832	5	I urge you to go back to the drawing board and to work collaboratively with all of us for a reasonable plan. And let me just close by saying that we have to fix this broken water system. I've dedicated most of my legislative career to trying to do that. There is no doubt that there are tradeoffs. But if you live here in the valley and you produce this incredible cornucopia of agricultural products that sit on America's consumer's dinner table every night, the highest quality foods at the most reasonable cost anywhere in the world, and you see your livelihood, in some cases for generations of families, like you've heard here today, like my family, and you wonder, where is there balance? Where are we talking about the sustainability? The plant clicked 7 billion people a year ago. By the middle of this century, we're going to have 9 billion people. Food is a national security issue. When are we going to start treating food like the national security issue that it is? We have to have sustainability to ensure that, not just Californians but people throughout our country and around the world, that we're able to continue to do what we do best, which is produce the best quality of food and fiber for Americans as we progress in the 21st century. And so this is all about sustainability, sustainability of our valley, sustainability of our state, and sustainability of our nation. And I think it's that holistic approach that the Water Board needs to keep in mind when we're balancing these competing needs. And I will continue to work with you to ensure that you remember and never forget the wonderful people of this valley.	Please see Master Response 1.1, General Comments, acknowledging the concerns of elected representatives and other community members and for information regarding voluntary agreements. Please see Master Response 1.2, Water Quality Control Planning Process regarding the consideration of beneficial uses. Please refer to the topic specific master responses for further discussion regarding impacts on agricultural and economic considerations.
833	1	Are you people nuts? I live in a city that is economically depressed. We all have economic issues here in Merced County. One of the things that bothers me in particular about this is, is that unelected people with no ties to our economic issues have no idea of what you are -- the impacts that you're placing on these people. Now, I'm also a business man. One of the things that I do when I make business decisions within my own business is a cost-benefit analysis. The cost and the benefits here just don't balance out. When it comes to what you're talking about, about 40 percent more of a flow, that's a 40 percent decline to the faces of the people that are behind me, 40 percent decline of their pay, 40 percent decline of their crops, 40 percent decline in my city for economic development. How are we supposed to absorb that? How are we supposed to do that? This past week, I heard of a new Air Quality Standard, the PM 2.5, which is another depressing thing, just going to put another boot to the neck of economic development within my city, within Merced County. Add to that a 40 percent inflow -- or extra flow for tributaries, give me a break. I'm all choked up about a fish. I am just all tore up that these fish are going to affect these lives. What about the tributary known as the Merced Agriculture Department and the people that support that, the people that are behind me right now that put the food on your table and mine, what about that? There is absolutely no correlation to having a 40 percent increase and sustaining family farms, ranches and dairies. Ladies and Gentlemen, I certainly hope that there is a whole lot more consideration to the simple fact that economic development within my city, within this county is going to be	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues. Master Response 1.1 also includes a discussion of the resources and impacts evaluated in the SED, including economic impacts. For further information on economic impacts, please refer to Master Response 8.2, Regional Agricultural Economic Effects.

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		impacted irreparably. Please think about that. These are human beings. They're not people that are going to go away. And we will fight you tooth and nail to make sure that this plan will never be implemented.	
834	1	The point I'm trying to make is we, in agriculture, not only me, but all my neighbors, friends, we're all involved with this community. And as business owners, we're all involved, and we're here for ourselves because we believe in our community and the future of our youth. This could never have been achieved without our past generations' hard work and the vision of a community and County revolving around water and agriculture. Our forefathers built infrastructure, schools, businesses and towns, making sure our future generations could help our communities grow. The State Water Resources Control Board's proposed unimpaired flow requirement would literally collapse our community, dismantle our economy and destroy our sustainability. Frankly, our future is the fifth largest County, in the United States, in total value of agricultural products sold would vanish.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
834	2	Under your proposal, we would have a severe shortage of water 50 percent of the time. That's not sustainable for us to farm, and grow crops and raise livestock. To replace this loss of surface water, your document states that we will be able to increase pumping groundwater by more than 1,000 acre-feet per year. At the same time, you are demanding we implement sustainable groundwater management policies. We all know, as common sense individuals, that surface water is the biggest tool that we have to preserve drought-stressed aquifers.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
834	3	Merced County agriculture is the number one economic driver in this County, will over $3.5 billion in gross revenues. If implemented, both the flow proposal and the Groundwater Management Plan, you will definitely destroy this County and all its communities. This would be the largest water grab in this State since the Metropolitan Water District robbery of the Owens Valley water. Are you doing this because we are a small, poor, agricultural-based community? Are you doing this to benefit others? If we were Los Angeles, would you be taking our water? This devastation could all happen with a decision made by you, an appointed Board that would be not held accountable for your actions. There has never been a time in our lives when we have felt so threatened with our future. We all work so hard at keeping our youth involved in activities that would have a positive outlook on their wanting to stay and better our community. If this Board has a conscience, and is truly concerned about this State and its communities then you, the Board, should look at other alternatives that would benefit and not destroy this County.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
834	4	The Merced Irrigation District, the Merced Safe Plan would be a positive alternative to the Bay-Delta Plan. And, also, looking at building reservoirs in dry canyons, off-stream, and getting water diverted in wet years to them. That way, it wouldn't impact the salmon.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
835	1	I have used Merced River water for 66 years. I'm going to cut this down. Exchequer Dam, our containment and river rights are pre-1914, and in accordance with the law of the land. You have suggested water increases for southern Delta to improve quality. Well, a water flows across our watershed and down our river, it accumulates salt. Thereby, more water provides more salt and the salt concentration index remains the same.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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		MID constructed and paid for Exchequer Dam containment. If Exchequer Dam were constructed today, the costs would be one and a quarter billion dollars. We have a cattle ranch, which is also a private fish and wildlife reserve, with no fishing or hunting allowed. I have seen two-thirds of this ranch three feet deep in water, and the large creek within overflow waist deep for 2,000 feet. The creek, for 80 years, has always had water at lease six-foot deep. In the last three years, this water has dried up intermittently, but it's a cycle. And it will return to abundance. You must be patient, as we are. MID irrigating a hundred thousand acres, also influences with underground recharge, another 400,000 acres. One-half million acres, with a crop value of three-quarters of a billion dollars. To do this, we need all inputs we now have, land mass, climate, infrastructure, manpower, and most of all water. The most efficient, effective, sensible, compatible and decent method of enhancing the life of the fish would be the Merced River SAFE Plan.	
835	2	In reference to the proposed Bay Delta Water Quality Control Plan SED, I have benefited and responsibly used Merced River water for 66 years. Merced River flow an average of one million acre feet per year. MID diverts five hundred fifty thousand acre feet of which 300 thousand is sold to its growers for use on a hundred thousand acres. Two hundred fifty thousand is consumed by people with riparian rights, system distribution seepage and evaporative loss. Four hundred fifty thousand acre feet continue down the river to the Delta for fish and wild life or other uses thereof. The water is first accumulated in our watershed area. Then contained in our Lake McClure behind our Exchequer Dam, then distributed in coordination with government officials with rules and regulations thereof. Our containment and river rights are Pre- 1914 and in accordance with the Law of the Land. You folks want to use the wrong river for quality improvement. December 13, 2016 Merced River flow was 800 second feet at Bagby. Sacramento River at Hamilton was 13,000 second feet and accumulated in a watershed and river with much less surface salt. You are presently, on average, receiving nearly half of the Merced River flow and when you want it. Plus the bottom 115,000 acre feet of McClure belongs to you and we deliver 15 second feet to the Merced Wildlife Refuge.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
835	3	Any alteration in our water supply would be devastating for the entire Merced area and all of its people, fish, wildlife, infrastructure, investments, tax payments, food and fiber production for the people of Merced, California, United States and all over the World.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
835	4	We will resist with a legal battle second to none! There has not been an injustice delivered to you folks. Prior to this day, we have worked together and accumulatively and have continually balanced all inputs of this project for over 100 years.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
836	1	John Larson, a farmer here in the area. And I'm in total agreement with the MID's SAFE Plan.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
837	1	I did say to Mr. Howard, when he was there at the Board meeting here back in October, I believe, that -- excuse me -- that the timing of this around the holidays and stuff is really -- has people uneasy. Because everybody has families that they're either coming into town or	Please see Master Response 1.1, General Comments, regarding the public outreach process and the comment period. Note that the public comment period was extended for a total duration of 6 months. Note that public hearings were held in Stockton (December 16, 2016), Merced (December 19, 2016), Modesto

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		they're leaving, and it's unfortunate that it had to be done like that.	(December 20, 2016) and Sacramento (November 29, 2016 and January 3, 2017).
837	2	The economic analysis in the SED clearly underestimates or simply does not even take into account the many impacts this proposal will have, such as land value, volatility of supply, and the downstream impacts that you just heard Mr. Silveira say on dairies and livestock operations. Additionally, a recent economic analysis requested by three counties, San Joaquin, Stanislaus and Merced, concluded that the potential long-term economic impacts of this proposal were upwards of $7 billion over the next 50 years. To a region recovering from the recession, this will be devastating. Our communities cannot face those kinds of impacts and still survive and thrive.	Please see Master Response 1.1, General Comments, for general information regarding the economic analysis and effects. Please see Master Response 8.1, Local Agricultural Economic Effects and the SWAP Model, regarding the scope of the economic analysis and potential effects of reduced water supply reliability. Please see Master Response 3.5, Agricultural Resources, for discussion of the potential effects on dairies and livestock operations. Please see Master Response 8.2, Regional Agricultural Economic Effects, for discussion of the economic effects on dairies. Please also see Master Response 8.2 for discussion of the economic analysis performed by Stratecon, Inc.
837	3	According to the state's mapping of disadvantaged communities in Merced County, at least a portion of every community in Eastern Merced County is identified as a disadvantaged or severely disadvantaged communities. That means that these families live on less than 80 percent or even 60 percent of the state's medium income. This includes the cities of Merced, Atwater and Livingston. And then the smaller communities I represent, in Planada, Le Grand and El Nido. While unemployment in Merced County has decreased, it's still almost twice the national average. Merced's unemployment rate as of October was 8.6 percent, compared to 5.3 in California, and 4.7 nationwide. On the groundwater, these communities all solely rely on groundwater for their drinking water supply. When groundwater levels start to drastically decrease due to the lack of surface water and increased pumping, these are communities that will be burdened.	Chapter 13, Service Providers, and Chapter 22, Integrated Discussion of Potential Municipal and Domestic Water Supply Management Options, provide detailed discussion regarding how drinking water supply would potentially be impacted by implementation of the plan amendments, and discuss potential mitigation measures for significant impacts. Please see Master Response 2.7, Disadvantaged Communities, for consideration of disadvantaged communities, and the State Water Board's technical and financial assistance programs for DACs. More information is provided in Master Response 3.4, Groundwater and the Sustainable Groundwater Management Act.
837	4	Merced County is already facing tough challenges during this record-breaking drought. And with the recent implementation of the Sustainable Groundwater Management Act, the state has identified our groundwater basin as a high priority and in critical overdraft. And now the Water Board proposes to take away the most significant option we have to help bring our groundwater into sustainability. On one hand, the state is requiring us to be sustainable. On the other hand, the state is trying to take away the one thing that could make our subbasin sustainable without turning our valley into a desert. This isn't on here but I'm going to say it, it sounds like the state is talking out of two sides of their mouth. And that's the gripe that we see. Because we're trying to do what the state's -- the regulations, but yet now we're facing with this.	Please see response to comment 834-3.
837	5	The proposal doesn't make sense. It needs to be rethought to protect the 1.5 million people who work, live and rely on the water here, in addition to the -- and I know you've said this already, it was a misstatement, but the 1,100 fish the SED hopes to produce.	Please see Master Response 3.1, Fish Protection, regarding SalSim.
838	1	I believe that this Board has failed to realize that this is a quality of life issue and the biggest threat to our community in the last 100 years. It is incredibly frustrating that our concerns have not been considered. There have been no meaningful meetings to provide input as this plan was being developed. I encourage this Board to seek an approach that benefits all. Right now you are a long way from that. You've had one hearing in this entire process, six	Please see Master Response 1.1, General Comments, regarding the public outreach process and public hearings held to solicit public comments.

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		days from Christmas, in the middle of the day. People are out of town or working. And this alone tells us how much value you have placed on our concerns.	
838	2	The devastation to our economy and drinking water have simply been glossed over. This plan directly harms the ability for us to remain a viable community, one that is welcoming to all citizens who would consider Merced as a place to raise their family or start a business.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues and for general information regarding the economic effects and economic analyses disclosed in the Recirculated SED (primarily Chapter 20, Economic Analyses). Please also see Master Response 8.0, Economic Analyses Framework and Assessment Tools, Master Response 8.1, Local Agricultural Economic Effects and the SWAP Model, Master Response 8.2, Regional Agricultural Economic Effects, and Master Response 8.4, Non-Agricultural Economic Considerations, for additional discussion of economic effects related to the plan amendments. Please see Chapter 13, Service Providers, Impacts SP-1, SP-2a, and SP-2b for a discussion regarding potential effects on service providers as they relate to drinking water.
838	3	This is an incredibly flawed plan. And I would encourage those in Sacramento to reconsider this potential disaster. We must forge a path based on wisdom. Any plan that creates winners and losers is doomed to fail.	Please see Master Response 1.1, General Comments, for responses to comments in general opposition or support of the plan amendments.
839	1	You feel like the communities are opposed to this, because there are some misunderstandings, but I hate to disagree with you. We are opposed to this because we very much understand the very real impacts that this is going to have. The people who are most nimble and most able to react to impacts to the fisheries are the districts that actually are in the river every single day. They have – you heard them, Steve and Peter both said today, they invest a million dollars every year in science and research on their river. There is nobody who is more invested, literally and figuratively in the health of the watershed than the very districts who react to the impacts to the fish.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
839	2	The economic impact is something that I think - it's been overlooked. I've been raised in the Valley my entire life. I went to Fresno and I know the little community of East Porterville very well. And I know that you have folks down there who are showering in parking lots right now. And that's not acceptable. And we're not going to accept that here. And taking away a huge amount of our surface water is going to move those impacts further north. California's one of the strongest economies in the world. We are a global economy. We are proud of it. We are not going to live like a third world country.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
839	3	Another thing that has been significantly underestimated is the impacts to our groundwater. We are a critically over-drafted high-priority basin. Before the drought hit, we were actually -- we consider ourselves in equilibrium, so all right -- we have tapered off what we were losing. And we are making progress in the right direction. And that was due to the hard work of the districts, of the growers who have implemented a lot of demand-side management for their crops. And then the drought hit and things changed. And we don't have the ability to implement the conjunctive use projects that we used to have. And we're continuing to work on that through grants and through additional conservation measures. Taking away such a significant source of the surface water that's critical to implementing those conjunctive use projects eliminates that opportunity permanently. That will create attrition and further contraction of the agricultural industry in San Joaquin County.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
839	4	The San Joaquin Farm Bureau, we were fortunate in that we had one of the best crop reports that we've ever seen two years ago. And we thought okay. So we're going to make it	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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		through this drought all right. And then we saw a $0.4 billion drop-off this past year. That's significant. Six of our top ten crops saw significant losses. That can't be sustained and continue to sustain the economy.	
840	1	I've witnessed the degradation of water quality and it has directly impacted m y business with the increased presence of invasive weeds such as Water Hyacinth and toxic algal blooms have had negative effects. This past year I had two large groups cancel their tour due to a blue-green algae bloom in parts of the Delta. Even though my tour would not be paddling anywhere near the bloom, I lost a huge chunk of business due to the perception that the Delta is toxic. The Delta needs increased fresh water flows and a reduction of water exports to keep the ecosystem and water quality healthy. The salinity standards should not be reduced. The past couple of years I've encountered hundreds of jelly fish in the San Joaquin River in front of Antioch and within Sherman Lake waterfowl management area as recently as November of this year. And increased presence of seals and sea lions. Reducing salinity standards would further degrade water quality and affect the water my family and I drink. My hope is that you'll consider the people who depend on the Delta for drinking water and the businesses who depend on the Delta for tourism and increase flows by allowing more fresh water to reach the Delta.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
841	1	It's not about the fish and it's not about the farmers. Although that's very important, and I've learned a lot in this process through a very serious illness that I contracted in the water, in saving my son's life. That water from the lack of flow from the rivers has increased the brackish water. I have done numerous researches, this has put a mortality on my life. The brackish water increase and the lack of flow in the Delta, although my son survived with only chronic skin rashes, respiratory issues, and debilitating headaches, I might not be so lucky from my mortality rate from the NTM caused by the bacteria from the blue-green algae and the brackish water. I suffer from debilitating side effects and endless rounds of medication. The lack of the water flows will increase this likelihood for 11,000 miles of waterfront and no matter how many signs I can put up or how many people I can tell of the risk of this happening to them and their children and your children and your grandchildren. And although you might not be on the Board when this goes through, how are we going to stop people and children from going in the water and being at this risk? It has happened in many lakes already, due to lack of river flows. But it is risking real people's lives and I'm finding that there's a lot more people than just me that have suffered from severe neurological damage. And yesterday, I found out that I will never hear in one of my ears again. So it's not just about the fish and the environment, it's about human life. How are you going to spend the -- how are you going to put up the signs and notify people that the water will be at risk? All just for palm wonderful, for wonderful pistachios? They're more important? How can that be? What about our children? We can't put signs up on every single levee, every 10 feet. It's more than just the fish. I beg you to consider that. I don't think it's been clearly	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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		brought to the attention and there is much research available for it.	
841	2	I live in Discovery Bay now and I've noticed for the last two years, since I can never go in the water again, is that the flow has never been the same. On our dock it continuously has been lower, especially at night. And we used to see it go up and down and now it doesn't anymore. And the water quality has gotten worse and worse and worse. And as I see the neighbors bring their children to swim in the water I go over there and I run and stop to tell them, "Please, pull your baby out of the water." I can't do that to everyone, it's impossible. What is the Board going to do to make sure that people don't get sick from this bill being passed?	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
842	1	Chairman, Members of the Board, today we are here, as you can see, to express a community's view toward a proposal from the staff of the State Water Quality Control Board to increase to 40 percent the unimpaired flows of the Merced, Tuolumne and Stanislaus rivers. You might not think that this would be a law enforcement issue, but that would be wrong. As you can see from today's turnout, this is a quality of life issue for us. And nothing is more fundamental to government's role in protecting our quality of life than adequately funding public safety services. By stealing desperately needed water, you are endangering our economy, threatening jobs, threatening educational opportunities, and the integrity of our drinking water. And in doing so, whether wittingly or otherwise, you are impairing our ability to protect our people.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise a significant environmental issue. Please refer to the Service Providers Section in Master Response 1.1, General Comments, for a discussion of health and safety. More information about water supply for public health and safety and the Human Right to Water, is available in Master Response 2.1, Amendments to the Water Quality Control Plan, Master Response 2.7, Disadvantaged Communities, and Master Response 3.6, Service Providers.
842	2	If implemented as recommended, this plan represents a potential death sentence for our economy. It is a direct threat to drinking water quality and will require local governments to divert millions of dollars to mitigate the damage your recommendations would cause. That money can only come from essential services, like police, fire, prosecution, and other public safety functions. We are among the most economically challenged areas in the state and still struggling to emerge from the recession that rocked our communities to their foundations. Our public safety services have only recently begun to recover from the devastation of that recession. Your proposed actions would cost our communities millions of dollars, when we can least afford it. And yet you offer no mitigation whatsoever.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues and for general information regarding the economic effects and economic analyses disclosed in the Recirculated SED (primarily Chapter 20, Economic Analyses). Please also see Master Response 8.0, Economic Analyses Framework and Assessment Tools, Master Response 8.1, Local Agricultural Economic Effects and the SWAP Model, Master Response 8.2, Regional Agricultural Economic Effects, and Master Response 8.4, Non-Agricultural Economic Considerations, for an additional discussion of economic effects related to the plan amendments. Please see Chapter 13, Service Providers, Impacts SP-1, SP-2a, and SP-2b for a discussion regarding potential effects on service providers as they relate to drinking water. Please also see Chapter 16, Evaluation of Other Indirect and Additional Actions, Section 16.5, Sources of Funding; Chapter 22, Integrated Discussion of Potential Municipal and Domestic Water Supply Management Options, and Master Response 2.7, Disadvantaged Communities, regarding financial assistance programs designed to assist agencies with water quality projects and sources of funding and assistance. For a discussion of mitigation measures as defined by CEQA and the mitigation measures proposed throughout the SED, please see Master Response 1.1.
842	3	Since 2012, when the first report was released, the Water Board has declined to answer questions and has refused to discuss the basic assumptions used as the foundations of its proposal. To this day, the Board, its staff and consultants have not yet met with the technical experts from our cities, our counties, our schools and others to explain how you got to here, to inform us of your assumptions and other considerations.	Please refer to Master Response 1.1 General Comments for information regarding the public outreach process. Please refer to Master Response 3.1, Fish Protection for additional information regarding the scientific justification for the LSRJ flow objective.

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842	4	My job as District Attorney is to make people understand that actions have consequences. The Water Resources Control Board must similarly understand that its actions have consequences, as well. Your proposal will have cataclysmic consequences for the health, safety and basic quality of life of Merced County and residents of the entire Central Valley for whom adequate water is literally the sustaining source of our economic and community lives. I do appreciate your willingness to be here today. And I implore you to listen carefully to the voices of those whose lives you will change irrevocably if the Board's misguided plan is implemented.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise a significant environmental issue. Please refer to the Service Providers section for a discussion of health and safety. More information about water supply for public health and safety and the Human Right to Water, is available in Master Response 2.1, Amendments to the Water Quality Control Plan, Master Response 2.7, Disadvantaged Communities, and Master Response 3.6, Service Providers.
843	1	I'd like to start out with a quote from a farmer just a little far south of us here, Eric Wilson. And his quote is this and it's very profound, "Never before in human history as a society actively sought to end their own food supply." And it appears to me that that's the road that we're traveling down. And all of you have families. All of you live in communities. And some day somebody is going to be held accountable for when they go to the refrigerator and they open the door and there's not quite enough food there. And then they're going to say, well, let's run to the grocery store, and they run to the store and there's not quite enough food there.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment about the plan amendments or do not raise significant environmental issues.
843	2	And so what I'd like to ask is for you to think about the legacy that you'd like to leave in the State of California. You serve the public, right, just as I do. And so, you know, as you take that into consideration, you know, the SED Plan is just flawed. I mean, it doesn't take in, as all the speakers have said today, all the factors that need to be analyzed. So I'd like to lift up the Merced Irrigation District's SAFE Plan and ask that you start the negotiations. And instead of sitting on a table up on a stage and having us on the ground down below you, that you engage in the process and that we all end up with a society that we're happy to live in and that we can be held accountable to and feel good about the decisions we've made.	Please refer to Master Response 1.1, General Comments, for responses to comments in opposition to the plan amendments. Please refer to Master Reponses 2.4, Alternatives to the Water Quality Control Plan for information regarding the Merced S.A.F.E. plan.
844	1	I want you guys to seriously consider MID's Plan. The SAFE Plan is the best of both worlds. It helps both the fish and it provides water for the farmers, for agriculture. And I could sit here all day and state facts. You know, I don't got the facts with me right now. I could have wrote down anything, I could Google anything, sure.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
845	1	You used closed door, nontransparent studies. You didn't allow any input from the agencies that have been doing the studies on these rivers for over a hundred years, managing these rivers, and those were not allowed for input. I don't understand why no one, who's been running a river for a hundred years, and have kept it alive, shouldn't be allowed to have -- they have their say, but hasn't been involved in the whole SED process.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
845	2	One of your points is you said your number one priority is a stable, viable water source for California. How is two out of three years, with a zero inch allotment, considered a stable water source for California? And that's what we would have had, as a TID District member, is zero allotment in 2014 and 2015. We could not continue. If we did, we're back to the groundwater issue, again. We don't have enough wells to do that on our 700 acres. And I know the majority of the people that I deal with on a daily basis, as peers, do also not have	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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		enough wells to cover their ground. That means TID has to pump and that really sucks the groundwater out of the ground, and we're back to light wells.	
845	3	You will have your names attached to this SED. You will have your names go down in a legacy as possibly helping along the ruination of ag this year, in California, if this is allowed to continue. This is an economic decision, as well as an agricultural decision. And you talk about listening. But I went to meetings four years ago in Stockton, and I spoke at those meetings, and I spoke in front of your experts at that time, of flawed science, of the items that were brought to me at that time. And everybody said, gave back answers about vague, scientific answers. And they gave reference to poorly cited scientific procedures and scientific results, as well.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
845	4	What did you do for the last four years? You were tasked to go back, by the people that you sat in front of last time, to come back with an arrangement that was more manageable, more livable, and better. You returned four years later with a 15 percent increase over what you had come with the last time. That's irresponsible.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
845	5	I'm so disappointed in the politicians that we've seen come up here today, that not one of them held anybody up there accountable. And all they want to do is work forward, and try to manage and disaster manage what's going on, now. Not one of them said, what did you do with our tax dollars for the last four years, to make a document that's worse than what it was? I think we've heard that there are several flaws in the science and people have mentioned that. That's why I'm not going down that road at all. This is merely someone who was in front of you before, watched this go away, watched it came back. And the groundswell that you're seeing now is far greater than the groundswell you saw four years ago. Because the detrimental aspect of this new document is so much greater than it was four years ago.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
846	1	Good afternoon. My name is Marcus Metcalf. I'm a high school teacher at Atwater High School. I teach a course called Sierra Nevada, and we study hydrology. And we've taken field trips up to the Merced Fish Hatchery to talk about salmon and spawning and how they carry out the process. What impressed me was that, upon talking to the individuals there, that the salmon released from the hatchery were actually put into boats and dropped in the Delta. And they have sonar imaging technology that actually has to find striped bass populations and drop the fish away from these striped bass so they don't get decimated by the striped bass. My point is that this is a charade. It's not about salmon. This is about mitigating water flow into the Delta because of the loss of water from the Sacramento because of the WaterFix Plan, which you guys will not allow us to talk about. CHAIR MARCUS: We cannot, under the law, sir. And I just want to say, people can come up with conspiracy theories about why we're doing things. It's not a conspiracy theory, it's factual -- that you guys are trying to run this through. Well, you can't -- you can't increase flow from our rivers after the tunnels are created. You have to do it before. So that's why you're here now. And the SAFE Plan looks like a great plan as an alternative to what you guys are talking	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

Table 4-1. Responses to Comments			
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		about.	
847	1	A local solution really needs to be looked at. My sentiment goes with salmon. I don't think there is enough or are enough people who can speak for salmon.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
848	1	I urge that you reduce exports and maintain the existing salinity standards in the south Delta for all existing beneficial uses.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
848	2	I ask that you consider environmental justice in our Central Valley so that fish are safe to eat from the Delta.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
848	3	I think that standards should actually adjusted so that water quality can be restored and not just maintained. Permanent monitoring locations allow for better water quality assessments. Averaging should not be allowed. It's done frequently in the wastewater world. But we're not dealing with wastewater here. Mass balances of salt should be measured and monitored.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
848	4	A more accurate assessment of sustainable surface water exports is needed, so that we can have a sustainable groundwater resource.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
849	1	I'm a Director at Golden Valley Health Centers. We're a federally-qualified community health center, with 28 sites throughout Merced and Stanislaus counties. In 2015 alone, we treated over 110,000 patients in Merced and Stanislaus counties. Community Health centers are unique in that we care for all people that walk through our doors, no matter what. As such, about 80 percent of our patients are Medicaid and about 10 percent are uninsured. More than 30,000 of our patients are what we call agricultural workers. Their livelihoods depend directly on the agricultural economic base, here in our area. Community Health Centers care about the whole health of our patients, including the social determinants of health, things that happen outside of the exam rooms, outside of the clinic walls. Having said that, taking this much water from our community will disproportionately impact some of the most vulnerable populations in our State. Not only could these folks lose their jobs, but they won't be able to afford the increased water rates locally, which will inevitably come when their water quality deteriorates, or they need to buy the bottles of water because the tap won't turn on.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
849	2	As a private nonprofit, we also have to balance the cost of business and infrastructure. If we don't have the water to connect to our health centers, especially in the rural areas where we have health centers, like Wesley, or Le Grand, because we have water piped to every exam room, every break room, every bathroom, and every dental operatory. If we can't get that, our patients will suffer decreased access to health care. Access that's already very limited. So, thank you for being here today. I implore you to please listen to the folks that have spoken about the alternatives that are present, and please find something that works for all of us.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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850	1	For 36 years I worked for the University of California, doing agriculture research and extension work here in Merced County. I'm also here as a Board Member of the Central Valley Farmland Trust. Now, you've heard from many people that agriculture -- for every job on the farm generates agricultural jobs off of the farm. The really big multiplier here, in California, is in agriculture and the food processing sector and you find these agricultural processing plants all over California, especially in Southern California and in the Bay Area. So, the contributions, economically, from places like Merced County, are strongly felt in our greater urban areas. Because of our very special combination of climate, soils, the availability of water in the summertime, the production of the specialty crops that is lost here will not shift to another part of the U.S. economy. It will shift overseas and the jobs that are created in the processing centers, and allied industries, will be created overseas instead of in the country, domestically, because of the unique combination of climate, and soils, and water. My colleagues and I did a calculation on the impacts of losing a single acre of land, of some of the representative crops, and almonds which get singled out, that loss would be $24,000 per acre, per year. That's the total economic activity. Sweet potatoes, $29,000 per acre, per year. So, these are the losses. By almost any measure the unemployment rates, and malnutritioned teenaged pregnancy, this is a severely impacted area.	Please see Chapter 20, Economic Analyses, and Appendix G, Agricultural Economic Effects of the Lower San Joaquin River Flow Alternatives: Methodology and Modeling Results, regarding the multipliers used to assess regional economic effects in the plan area. Please see Master Response 8.2, Regional Agricultural Effects, regarding the regional agricultural economy, and regional agricultural economic effects of reduced water supply reliability. This comment does not make a general comment regarding the plan amendments or raise significant environmental issues. No further response is required.
850	2	From the perspective of the Central Valley Farmland Trust, we assist farmers, who want to keep their farms undeveloped and end farming in open space, forever. And we do that utilizing State funds, Federal funds, mitigation funds. And as you can imagine, the loss of surface water greatly diminishes the value of the farms. It makes it much, much harder for us to get funding for those types of projects. And, so, the loss of fresh water here, in the Northern San Joaquin Valley, would directly inhibit our mission as a Farmland Trust.	Please see Master Response 8.1, Local Agricultural Economic Effects and the SWAP Model, regarding water supply reliability and agriculture, and Master Response 8.2, Regional Agricultural Effects, regarding potential regional economic effects of reduced water supply reliability.
851	1	I am familiar with the planning process that you're going through. You guys are in a tough spot. I was a staff -- a city planner by training and staff to commissions and boards and councils for 20 years. But one of the most important parts of the planning process is to listen, and to listen very carefully, and to try and appreciate what you hear and to take advantage of help that you're being offered. And I think those are key things that you could take away from this meeting.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
851	2	The City of Merced depends on groundwater for drinking water. All of our water is from wells. We need to be able to recharge that water, and we need to have the flows to be able recharge that water. We depend on that water to do industrial development, residential development. Agriculture in the surrounding area depends on water in order to provide agricultural industry and agricultural businesses, all of which are the lifeblood of our community.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
851	3	We're careful and conservative with the use of water, both in the city, and I think in agriculture, as well. And as the current plan is proposed, I am opposed to the current plan as written because it would have a devastating effect on our community.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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851	4	The state proposal will increase unemployment it the area and the social ills that come with unemployment, crime, the health of our people even, and the reduced, I think, student achievement. All those things are related to people being employed and having a livelihood.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
851	5	Your question should be, so what do we do? We're trying to strike this balance. I think you have an alternative. The Merced Irrigation District has provided this SAFE Plan, Salmon Agriculture Flows and Environment Plan, that is backed with factual information based on people who really understand these issues in great detail, to create more backwater for habitat, to provide targeted flows in key times of the years to benefit the salmon, and to manage salmon predators, such as these non-native bass. So I think you need to work very much with the Merced Irrigation District to try and benefit from their understanding and knowledge about how this plan could be improved.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
851	6	I appreciate very much your presence here today and your attempt to try and hear what our community has to say in trying to strike a balance between the factors. When you try and strike that balance, I would urge you to give due importance to the livelihood of hundreds of thousands of people in the Central Valley.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
852	1	I represent the Merced River Conservation Committee, a local Mariposa County volunteer organization that's been interested in the Merced Watershed and its future. I've fished all over the world chasing trout, chasing salmon, and the Merced watershed is my favorite. Its anadromous fish stocks are on the edge of extinction and I'm worried about them. There is no scientific evidence that flows less than 50 percent unimpaired will achieve salmon and steelhead doubling targets for the San Joaquin River and the Merced River ecosystem.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
852	2	Even at higher than historic baseline flows, salmon doubling is possible only if accompanied by very precise management of flows.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
852	3	Huge investments in physical restoration of habitat in the lower Merced, and in the San Joaquin; rearing habitat restoration is required under all alternatives, but flows less than 50 percent unimpaired require proportionately higher restoration acreages, thus inflating cost.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
852	4	High temperatures limit egg incubation and juvenile rearing habitat, at flows less than 50 percent. This affects the Merced River's carrying capacity and reduces its ability to shape flows without serious negative effect. Can we reduce flows and simply construct habitat for Fall- run Chinook and steelhead in the Merced River and floodplain? My scientific, professional opinion is negative, that it is highly unlikely.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
852	5	In addition to increased floodplain inundation and spawning gravel addition, there are a number of non-flow measures that will improve salmon population conditions, screened, unscreened diversion, reduce the proportion of river flow directly diverted, reduce predator abundance, increase geomorphic flows through shaping, increase large, woody debris, and provide access to habitat above the existing project. Board mandated, non-flow measures to compensate for flow reductions are necessary, as well, for the restoration in salmon and steelhead.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
852	6	I recommend that you adopt a flexible >50 percent unimpaired flow standards, with options to increase flows should fish population targets not be met, through Adaptive Management measures. Science says 60 percent is required to meet the salmon doubling goal.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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852	7	Provide access to habitats above Crocker - Huffman and New Exchequer Dams. Habitat won't produce the desired results if temperatures in the river get too high, too early in the year. If young fish cannot escape (migrate) then simply doing habitat restoration won't provide much benefit.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
853	1	Despite our encouraging trajectory, we [City of Merced] are still among the most disadvantaged communities in the nation. Our community suffered when the federal government closed Castle Air Force Base 20 years ago. Next, our community was among the hardest hit in the nation by the financial and housing market collapse of the Great Recession. We are a resilient people, but taking more of our water is a bridge too far.	lease refer to Master Response 2.7, Disadvantaged Communities, for further discussion regarding disadvantaged communities and the financial and technical assistance programs available to assist them as regards their water supply.
853	2	Although we don't use surface water from the Merced River for domestic use, we rely on surface water from the Merced River to recharge our groundwater aquifer as the water passes through Bear Creek, Black Rascal Creek, Cottonwood Creek, Fahrens Creek, and a number of canals that wind their way through the Merced City limits. This recharge of our aquifer is crucial, not only for adequate water quantity, but also water quality, and helping to prevent salt intrusion into our drinking water. Your proposal to reduce the amount of surface water that is available to our region will directly impact both the quantity and the quality of our aquifer. You must take this devastating impact into consideration in your decision making.	Please see Master Response 3.4, Groundwater and the Sustainable Groundwater Management Act, for information regarding groundwater recharge. Chapter 9, Groundwater Resources, analyses reduced groundwater recharge from surface water percolation and describes existing water quality issues in the plan area. Appendix G, Agricultural Economic Effects of the Lower San Joaquin River Flow Alternatives: Methodology and Modeling Results, describes the approach to estimating change in groundwater recharge. Chapter 9, Impact GW-1 and Chapter 13, Service Providers, Impacts SP-2a and SP-2b, describe potential impacts on groundwater quantity.
853	3	All of our people and our families depend either directly or indirectly on agriculture. It's not about Merced having green lawns. Our lawns turned golden brown long ago, and our ballfields have turned to dirt. For us, this is about the very survival of our region that feeds the nation, and in many cases, the world.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues. Please see Master Responses 8.1, Local Agricultural Economic Effects and the SWAP Model, regarding water supply reliability and agriculture, and Master Response 8.2, Regional Agricultural Effects, regarding regional agricultural economic effects. No further response is required.
853	4	Do the right thing and deviate from the proposal that prioritizes 1,100 fish over the 83,962 hardworking people of our city. Adoption of the current draft of the SED will be adverse and severe for today's Mercedians and for our posterity.	Please see Master Response 3.1, Fish Protection, regarding SalSim. The purpose of the environmental review process is to disclose potential environmental impacts on the public and decision-makers. The plan amendments give consideration to potential economic effects in Chapter 20, Economic Analysis, per the requirements of Water Code Section 13141 and Section 13241. The plan amendments are not required to include a cost-benefit analysis as the commenter seems to suggest. Please see Master Response 1.2, Water Quality Control Planning Process, regarding consideration of beneficial uses by the State Water Board. Please also see Master Response 1.1, General Comments, regarding general responses to economic-related comments, including those attempting to compare costs and benefits. Please see Master Response 8.0, Economic Analyses Framework and Assessment Tools, regarding the types of economic assessments and the tools used to consider economics in Chapter 20, Economic Analyses. Please see Chapter 20, Section 20.3.3, Agricultural Production and Related Effects on Economic and Local Fiscal Conditions and Master Responses 8.1, Local Agricultural Economic Effects and the SWAP Model, and 8.2, Regional Agricultural Economic Effects regarding local and regional agricultural economics. Economic considerations associated with the recreation and commercial fishing industry are discussed in Chapter 20, Section 20.3.5, Effects on Fisheries and Associated Regional Economics, and Master Response 8.4, Non-Agricultural Economic Considerations, discusses the economic contribution of the plan amendments to fish and wildlife habitat and other beneficial uses.
853	5	We hope that you will reach an amicable agreement with the Merced Irrigation District and adopt their proposed SAFE Plan.	Please see Master Response 2.4, Alternatives to the Water Quality Control Plan Amendments, regarding information about the S.A.F.E. plan. This comment does not make a general comment regarding the plan amendments or raise significant environmental issues.

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853	6	As a city, we will also be directly impacted by your decision. We are ready and able to fight if the concern of Mercedians are not adequately addressed in your decision.	Please refer to Master Response 1.1, General Comments, for general comments on the plan amendments and discussion of the environmental issue commonly raised.
853	7	Once this hearing closes and the crowd leaves this theater, the lights will go dark. But if you listen closely you will hear something else. You will hear Southern California celebrating. They are celebrating your proposal because you know and I know that this was never really just about 1,100 fish anyway. Taking our water and giving it to someone else is neither right nor fair.	Please see Master Response 1.1, General Comments, regarding exports to south delta users. Please see Master Response 3.1, Protection of Fish and Wildlife regarding the justification of the plan amendments for protecting fish and the use of SalSim. Please also see Master Response 8.4, Non-Agricultural Economic Considerations, regarding ecosystem benefits.
854	1	I'm Mike Plum and I represent the McClure Boat Club, which is a community of 63 people on the shores of Lake McClure. The residents of the community are predominantly retired, and the age ranges all the way up to 97 years old. The Club operates a State-licensed water treatment facility, and the lake is our sole source of water. The drought causes us to look for alternative sources and there are none. We live on a rock and a well is infeasible. A press release in September made claims that the Plan would provide protection for drinking water, for irrigation water, and for the fisheries. I'm here to tell you that none of those protections are provided. The Plan will cause permanent drought conditions on the Lake. Those conditions are such that the Lake will be significantly lower. With that low water level, the Lake will fluctuate more frequently. This leads to a couple of nasty problems. The turbidity rises significantly, the temperature rises significantly, and with that temperature rise the algae blooms get out of control. So, we're talking about a storage facility, and the quality of the water that we're putting into the rivers is degrading tremendously. So, these increase in turbidity and algae greatly complicate the process of producing drinking water. And even when properly treated, our water takes on a swamp-like quality. This is in a million acre-foot storage facility. Think about what it does downstream. So, also, our water treatment costs grow tremendously with the algae and turbidity. This is a big hardship, financially, on such a small community. The hardship was recognized by the State Water Control Board during the drought, and we were awarded a grant to deal with these problems that are going to be inflicted on us full-time. We can't afford to live in that situation. Is the Water Control Board willing to finance, you know, fund us permanently? The increased temperatures to the Lake hurt the local fish population. You know, too little has been said about what happens with the Lakes in this scenario. The Chinook may benefit, but the steelhead don't. And, clearly, the Lake fish don't. The plans, with the Lake levels dropping, really minimize accessibility of the Lake. That tremendously hurts camping. It tremendously hurts many water sports. There are many boat manufacturers in the Valley, and less water means less boats, means less jobs. There's alternatives. The SAFE Plan, good start. Incomplete, though. Water flows don't fix everything. Infinite water flows wouldn't fix this problem. So, any plan needs to be far more complete, has to take into account more tributaries, needs flow rates specific to each tributary, and it needs to be far more rounded.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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		In conclusion, the Plan fails to deliver the stated protections. I implore you to honor those claimed protections and come forth with a plan that provides protections for our drinking water, for our irrigation, for our fisheries and, most importantly, for the people.	
855	1	Farming is one of the staples of our community. It is what has made California, basically, a Golden State, is farming. In this community alone we have over a $3 billion industry with our almonds, walnuts and pistachios. That's people's lives. When I go to the grocery store, because I don't farm, I depend on these people out here, all of them, to bring to my grocery store what I need in order to feed my family. So we have to take care of them in order for me to be able to take care of us. It's looking out for us, that it's looking out for my family, that it's looking out for my grandchildren, that it's looking out for these families, that it's looking out for these young kids when they come up and have families of their own. We have to put in place things for future generations, not just who you see here standing before you, but for people who are yet to be born. And so we have to put things in place for those farmers who are going to come up who are yet to set foot on a farm. So please, please, I implore you, look at this and do what's right, not just for us here but for our future generations.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
856	1	We seem to be passing, like ships in the night, and we're not communicating clearly and concisely to each other. And until we can communicate clearly and concisely with each other, and get on at least the same page, it's going to be very difficult to move this process forward, either in this regulatory process, or in a settlement process.	Please see Master Response 1.1, General Comments, regarding the public outreach process, and stakeholder engagement.
856	2	The Water Quality Control Plan that you've put forth has, on Table 3 [ATT1:ATT1], objectives for fish and wildlife. It's 30 percent to 50 percent, 7-day running average, February through June, and 800 to 1,200 CFS of Vernalis February through June. You then also have a new narrative objective. This is in addition to the doubling objective that you have in your plan, already, that talks about moving fish through what I call the migration corridor, from the tributaries through the Delta [AT1:ATT2]. And the problem here, that I'm having, and that my clients are having, is we are looking, and trying to understand what the impacts of the Plan are [ATT1:ATT3]. Because the Plan is only those three components. I know there's a doubling goal, but I'm assuming that the doubling goal is either subsuming these other ones, or is assumed in these other ones. And what's happened is the SED is silent. There is no analysis of 30 to 50 percent UIF in the SED. And at a CEQA project level, you have to begin with what your project is. Even if it's a programmatic project. Your component here, when you go and get this adopted, and it goes in front of the APA people, you have three components. You have the unimpaired flow, the minimum flow, and the new narrative. That's what you have. And those are the regulatory objectives that we will be required to meet.	Please see Master Response 2.1, Amendments to the Please see Master Response 2.1, Amendments to the Water Quality Control Plan, for information regarding the description of the plan amendments and the project description. Please see Master Response 2.4, Alternatives to the Water Quality Control Plan Amendments for information regarding the alternatives. The SED contains extensive analysis of the plan amendments, 30-50% unimpaired flow in the LSJR tributaries. Please refer to Chapter 4, Introduction to Analysis, for a discussion of plan amendment alternatives, adaptive implementation, and analysis, regarding the approach to analysis of 30 - 50 percent unimpaired flow in the SED. Please refer to SED Executive Summary, chapters, and appendices for analysis of the plan amendments, including Chapters 5 through 20 and Appendices B, F.1 and G.
856	3	In the analysis it talks about more constraints are needed to assure feasibility that reservoirs are not drained entirely, carryover storage was done. And if you look at those first couple bullet points, which go along with your Delta Flow Criteria Report from 2010, the project, as proposed, recognized that there were going to be immediate impacts to storage and water temperature [ATT1:ATT4]. Now, what's interesting is there's nowhere, in your environmental document, that you've	Please see Master Response 2.1, Amendments to the Water Quality Control Plan, for responses to comments regarding the description of the plan amendments. Please see Master Response 2.4, Alternatives to the Water Quality Control Plan Amendments for information regarding the alternatives. The SED contains extensive analysis of the plan amendments, 30-50% unimpaired flow in the LSJR

Ltr#	Cmt#	Comment	Response
		set out showing those impacts to reservoir, storage and water temperature. So, think about it. You've already made the jump in the analysis. So, what happened here, as far as I can tell, is that in the Delta Flow Criteria Report from 2010, it recognized that more water was going to be made available, mass balance of water has to come from somewhere. So, if it comes out of storage, water temperatures would elevate. So, what was modeled in the SED was how it might happen, but not how it will happen [ATt1:ATT5]. And the problem with that is that you have a modeling result, on paper, of a snapshot of what might happen in a program of implementation at a later date and time. But you haven't disclosed to the public what the actual project is. So, in this scenario, what happens is that the Plan is on the left-hand side, very straightforward. What the Plan isn't, it's not a block of water or a budget of water [ATT1:ATT6]. I've heard that numerous times in these proceedings, and before, from staff members, and it drives me crazy. Because if you go back to Table 3 [ATT1:ATT1], it doesn't say block of water. It doesn't say budget of water. It says 40 percent unimpaired flow--well, it says 30 to 50 percent unimpaired flow, 7-day minimum average. So, literally, every seven days we will be releasing 30 to 50 percent water on a particular river, at a particular time. That is what the State Water Resources Control Board cases required.	tributaries. SED chapters 5 summarizes results from hydrologic modeling for river flow, water supply, reservoir storage, and water temperature, in response to implementation of the LSJR alternatives. Please see Master Response 3.2, Surface Water Analyses and Modeling, for information regarding the Water Supply Effects model and modeled carryover storage and how the model represents a credible depiction of potential hydrologic changes in response to implementation of the plan amendments.
856	4	[MR. O'LAUGHLIN:] When Cliff [Lee] and I did this case, coming out of the 1995 Water Quality Control Plan, we got in this huge discussion because the San Joaquin River Agreement flows were not the same as the 1995 Water Quality Control Plan flows. So, I told Cliff, the Board had to make a finding of equivalency. Mr. Lee had other ideas about how the Board would structure its argument. But what was funny was, whether it was his way or my way, the response from Judge Robie was very clear. No, when the State Board adopted the 1995 Water Quality Control Plan, and the flows set forth therein, those are the flows that will be required to be met. Nothing else, and nothing more. CHAIR MARCUS: Isn't that because that's the way the Water Quality Control Plan was written? I think the attempt here, at least, was to create the flexibility to get people to work together, to use each molecule of water in the most efficient way possible. Are you saying that's impossible to do in a Water Quality Control Plan? MR. O'LAUGHLIN: I'm not saying it's impossible to do in a Water Quality Control Plan. But currently, as written in your water quality objectives, it is, because your objectives don't say that. Your objectives don't say 30 to 50 percent unimpaired flow, block of water that will equal X in certain year types. It doesn't talk about carryover storage. It doesn't talk about refill. It doesn't talk about--and this is a weird one. It doesn't talk about water temperature objectives.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues. Please see Master Response 2.1, Amendments to the Water Quality Control Plan, regarding a description of the plan amendments.
856	5	The current requirements on the rivers are set. And your plan builds on those. Now, leaving aside the operational problems about trying to figure out whether OCAP Table 2e flows should go down the river in February, or whether the unimpaired flows should go down in February, the problem is this. You have this disconnect where you take flows, at 40 percent, and then if there's not enough quantity of water based on perfect modeling, that's in your model, then what happens is you default to these OCAP Table 2e flows or FERC flows. Well, think about this. We're all semi-logical people. It's February 15th, it rained the first of the month, got a fairly decent flow, and you're running along at this 40 percent and you're	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues. In addition, please see Master Response 2.1, Amendments to the Water Quality Control Plan, for information regarding implementation of SLJR flow objectives and FERC requirements.

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		thinking, huh, things are pretty good. It turns dry. Now, all of the sudden, the 40 percent starts to drop. And you're thinking, well, this may be less than the FERC flows, what do we do? Well, your modeling, which is perfect, because it's in hindsight, would tell you what to do. But, what are you going to do?	
856	6	You're relying on other regulatory processes to support your Water Quality Control Plan. So, right now, the OCAP Table 2e flows are going to be under reconsideration in the re-consultation process. Under the OCAP BO, Table 2e flows are under the FERC flows, and those change, your Water Quality Control Plan has relied on those flows, and those flows are no longer there, are you providing the reasonable protection for the beneficial uses that you've set out.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues. In addition, please see Master Response 1.2, Water Quality Control Planning Process, for the authorities governing the process and the FERC. Please see Master Response 2.1, Amendments to the Water Quality Control Plan, regarding a description of the plan amendments.
856	7	This is current New Melones storage [ATT1:ATT8], end of month September, and the current is D-1641. RPA flows, which are Table 2e, dissolved oxygen. Now, we have similar runs on the Tuolumne and the Merced. I'm not going to regurgitate those. So, this is what it looks like today. So, if this is the hydrology over the 82 years, and if we had this program, this is what the storage would look like. This is what storage looks like under your proposed WSE model [ATT1:ATT9]. So, what you did was you took refill, you took carryover storage, you sent 40 percent unimpaired flow down the river, and this is what your modeling results show. And you never go below 700,000 acre-feet. This is 40 percent [ATT1:ATT10]. We ran it exactly as you ran it, with one small difference. No carryover storage, no refill, no flow shifting. We kept CVP, Oakdale, South San Joaquin, and we met DO. And as you'll see, in this document, this will drain the reservoirs. So, the question is, if the project is going to drain the reservoir, the objectives are going to drain the reservoir, how is it, then, that you go from that project to something else, and what is your legal authority and basis for going to something else in what--you've basically put everything in your plan of implementation, and you're hoping that when you get around to your plan of implementation that you have the legal authority and capability, through water rights, or other methodologies, to do this.	Please see Master Response 2.1, Amendments to the Water Quality Control Plan, for clarification of the program of implementation; Master Response 1.2, Water Quality Control Planning Process, regarding State Water Board Authorities and water rights; and Master Response 3.2, Surface Water Analyses and Modeling, regarding reservoir operations assumptions, including carryover storage.
856	8	I'll just give you an example, on the Stanislaus. You would be telling, under your refill and carryover storage requirements, you'd be telling the senior water rights holders on the river, Oakdale and South San Joaquin, to put water into a junior water right holder's facility, a Federal facility, and that water would be used to meet CVP project purposes, under your modeling. So, what would happen is Oakdale and San Joaquin dump, in some years, up to 300,000 acre-feet into the reservoir to maintain these carryover storage requirements. Then what happens is Reclamation is releasing that water to make Table 2e flows the rest of the year, not an Oakdale or South San Joaquin Irrigation Requirement. DO requirement, not an Oakdale or San Joaquin requirement. Salinity at Vernalis, not an Oakdale or South San Joaquin requirement. And not only that, your carryover storage requirements also put more water into storage than is required under what you've set forth. So, on the Stanislaus, in some years, because the model has perfect foresight, it puts up to 1.15 million acre-feet in storage, when your carryover storage is 700,000. Because it knows that in the model there's going to be two or three more dry years to come. So, we got a	Please see response to Comment 856-7.

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		serious problem here. And I think, as the people who have to decide the reasonable protection of beneficial uses, you at least, first, have to understand what it is that your project is being proposed before you get to what it is you may be able to do in a plan of implementation that may mitigate for those requirements.	
856	9	I love fisheries. So, benefits to fisheries [ATT1:ATT17]. This is a real important one. And I totally disagree with the presentation made by your staff on this one.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues.
856	10	In the SED, you put down all the species in the plan area, and you'll see them on [ATT1:ATT17]. So, these are the species in the plan area, okay, and we cited to it in your document. You analyze one species in the SED, Central Valley fall-run Chinook salmon [ATT1:ATT18]. But that's interesting about this, if you look at the left-hand side of the equation [ATT1:ATT17], none of these fish meet your requirements. Because, remember, the fish have to migrate to and from the tributaries, through the San Joaquin, and through the Delta. And most of these fish, on the left-hand side, in fact all of them, don't do that. So, you have a problem, which is you've described your narrative, now, as these natal streams supporting these fisheries coming and spawning, and moving out through the system. In addition, most of these fish that reside in the Delta are not studied or examined because, in this document, you cut your inquiry off at Vernalis for the fisheries. You did not look into the Delta as to what the proposed benefits would be. So, you looked at Central Valley fall-run Chinook salmon. Pacific Lamprey fit into this category, but there's no information. And, finally, your staff said that there was a paucity of information available on steelhead and, therefore, they were excluded from the analysis. I know, in follow-up slides, your staff has said that Rainbow Trout were a beneficiary of this program. The problem is, Rainbow Trout don't fit into this because Rainbow Trout, resident Rainbow Trout are not migratory. It has to be the O. mykiss, the anadromous form, that is transitory, that would be a benefit of this program.	Please see Master Response 1.1, General Responses for responses to comments that do not raise significant environmental issues associated with the analysis contained within the SED or request a modification to the plan amendments, and for information regarding general methods and modeling used in the development of the SED. Please also see Master Response 3.1, Protection of Fish and Wildlife, for information about use of the best available science and use of surrogates.
856	11	In your SED, 1984, it does say, and you use SalSim, and you came up with 1,103 Central Valley fall-run Chinook salmon. Okay. Now, leaving aside the 1,103, we told you, in 2012, not to use SalSim. We told you all the problems with SalSim. Okay, you decided to go ahead and use SalSim. So, it's kind of like that situation where you've asked your consultant for an answer, they give you an answer, and you say, hum, that's not quite the answer we had in mind. So, you got the answer and, now, you're in a situation where you don't like the answer. But what you have to put into context here is the number. In the SalSim modeling that you did, it talks about the production of fish. So, production is different than escapement. Production is the overall number of adult fish. Escapement are the number of adult fish that return to the river system.	Please see Master Response 3.1, Fish Protection, regarding SalSim. For a discussion of SalSim limitations, refer to the sub-section addressing comments regarding SalSim having many errors and being a flawed model. Also refer to the sub-section explaining why the State Water Board used SalSim" for justification of the use of SalSim, proper interpretation of its results, and expectations for its applicability to fisheries management decisions. For a description of total adult salmon production, which was used as the primary comparative metric used in the SalSim evaluation, refer to Chapter 19, Analyses of Benefits to Native Fish Populations from Increased Flow between February 1 and June 30, Section 19.4.2, Methods of State Water Board SalSim Evaluation, and specifically to the sub-section titled Methods: SalSim Evaluation Criteria.
856	12	In the Central Valley, and we've had this, because I know your question's coming up, Mr. Moore, on this one, we put in a number that there's 707,598 Central Valley fall-run Chinook salmon produced annually, in the Central Valley. Okay. Now, we've broken this down by years. We have different bases. We've done it in 10-year stops. We've done it the last 10 years, the first 20 years, and so forth and so on. The number does vary, I will tell you. It does go down in some 10-year periods. It never gets below 600,000. So, even if, and I saw your staff slide where they said that they're going to get 4,000 adult	Please see Master Response 1.1, General Responses for responses to comments that do not raise significant environmental issues associated with the analysis contained within the SED or request a modification to the plan amendments, and for information regarding resources impacts.

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		fish. Even if you got 4,000 adult fish, in the context of 600,000 fish, then, now we can start talking about the weighing and balancing that's going to occur between the water demand and the impacts with the number of fish that you may get.	
856	13	This [ATT1:ATT19] is information from your SED about what the benefit would be on an economic basis. Basically, it comes out, and even if you multiplied it by four, which would be 4,000 fish, you'd only get about 100,000 a year economic benefit at the dock.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment regarding the plan amendments or do not raise significant environmental issues. Please also see Master Response 1.1 regarding responses to general comments regarding the economic comparisons. Please refer to Master Response 8.4, Non-Agricultural Economic Considerations, for information regarding ecosystem services and benefits associated with the plan amendments.
856	14	Let's go to SalSim [ATT1:ATT20]. So, your staff is running away from SalSim, and I understand why because the answer doesn't coincide. But one of the things that we've talked about, in this proceeding that I've talked to you previously about, is the June question. So, if you look at this slide, this is the base case run. This tells you how many fish are leaving the tributaries in the month of June. Okay? So, look at the slide and look at the Tuolumne River [ATT1:ATT21]. There aren't any fish coming out in June. There are some fish coming out on the Stanislaus River. We then said, we'll take your SalSim model apart. We did get a response to our PRA, and thank you very much. We appreciated that. So, now, if you look at the results from SalSim, you will see that the number of fish leaving the Stanislaus system declines by, on average, 42 fish. The number on the Tuolumne does go up by 151 fish [ATT1:ATT22]. And that all occurs in one year, which is June of 1996. So, in the tradeoff of the world, if 45 to 50 percent of the water cost is occurring in June, and you're getting a net result of a hundred additional fish out, you have to wonder, a hundred fish get out, survivability coming back is about 2 percent. So, you've gotten roughly two fish back for 45 to 50 percent of the water costs of your proposed program. We have to be careful when we start talking about these numbers about what is or isn't doable. Your staff threw this up in a technical workshop. It's from FISHBIO, who does the monitoring, the rotary screw trap monitoring on the rivers. And this is being put forth, I believe, by your staff, as the proposition that there are fish present in June. There is no disagreement by the agencies that I represent that fish out-migrate in June. But you have to look at the chart to figure out what's going on. And the first thing you look at, when you look at the chart, is if you look at the little blue line that's squiggling across the top, you will notice that starting sometime in March, almost all the way through May, that roughly 7,000 CFS is coming out of the Tuolumne system [ATT1:ATT23]. Well, that's not what you're proposing. That's not what you can propose. Those are flood control conditions. This is 2006. And, so, if you go back in the big years, if you go back in 2006, 1999, 1998, when the flood years were occurring, you will see fall-run Chinook salmon out-migrating in June. No doubt about it. But here's the problem. And the conundrum is when you're in the managed flow conditions, which is what most of your proposed plan is, you don't have these flows. They're not there. And they're not there for that duration. And if you look in the managed flow conditions, there are zero fish coming out, in June, from the Stanislaus, the Tuolumne and the Merced. And we have all the rotary screw trap data. We've provided it for your staff. For some reason, it never made it to the report. CHAIR MARCUS: So, the point that you're making there is there are fish present in June, they're in high flow years. You can't--the tradeoff in the low flow years isn't worth the pain,	SalSim's equations related to temperature and floodplain for juvenile salmon are flawed, and thus limit the usefulness of evaluating changes to the juvenile life stage. Please see Master Response 3.1, Fish Protection, regarding the limitations and use of the SalSim model and the importance of June.

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		particularly in that month? MR. O'LAUGHLIN: Well, the pain is, is that let's say it's a low-flow year, and let's say you threw down another 1,000 CFS, you're not going to get those fish. CHAIR MARCUS: It's not high enough to get that response. MR. O'LAUGHLIN: Right.	
856	15	I spent a ton of time with your Delta Flow Criteria Report, back in 2010 [ATT1:ATT25]. We did not oppose the Delta Flow Criteria Report, when it was presented. And, so, in your report, you say very specifically two things that you're going to get. At average, 5,000 CFS, March through June, at Vernalis [ATT1:ATT26], will substantially improve fall-run Chinook survival and abundance. Okay, so think about that, 5,000 CFS. That's February through June. That's 10,000, that's 1.5 million acre-feet. At an average of 10,000 CFS from March through June, you can double San Joaquin Basin fall-run Chinook salmon. So, let's take that as everybody who's come in front of you has said that's the science, that's what we need. Okay? What your staff did is they looked at those numbers and they said, if we took 60 percent of the UIF from February through June, we achieved an average of 5,000 CFS 85 percent of the time, okay, and 45 percent of the time we'll get 10,000. In that scenario, you read that and it will tell you, well, if I'm going to get 5,000 CFS 85 percent of the time, I'm going to substantially improve fall-run Chinook salmon. And, if I can get 45 percent of the years at 10,000, I'm on my way to the doubling goal. Right? So, you would say, going on the unimpaired flow paradigm, that this is where we need to go. And your staff has said, we need to keep this up. So, here's where the bait is. This is a very convoluted, complex graph, but it's not that difficult. There's two circles on the graph, and they depict where the 5,000 and the 10,000 are. And they tell you when these flows occur in wet, below normal--above normal, below normal, dry and critical years. Okay, we've redone this graph and we're going to present it to you at a later date. And what it will show is that you will never meet what these circles are. And here's the reason why. Here's the switch. The Delta Flow Criteria Report utilized the entire San Joaquin River Watershed. The entire watershed [ATT1:ATT27]. So, it had Stanislaus, Tuolumne, Merced, Chowchilla, Fresno, Upper San Joaquin. You even had Tulare Lake Basin outflow. You had this floor in the west side, okay. So, if you think about it, the way I like to equate this is think about the entire basin being a 10, okay. So, just call it 10 acre-feet. And, so, to meet those achievements and those goals, you were going to have 60 percent, or call it 6. Right? So, we needed 6 at Vernalis to meet those goals of substantially improving fish our doubling. In the Water Quality Control Plan that you've currently put on the table, you only used the Stanislaus, Tuolumne, and the Merced. And when you do that, what happens is you have taken roughly 40 percent of the watershed away. CHAIR MARCUS: Forty percent of the watershed that makes it to the Lower San Joaquin how often? MR. O'LAUGHLIN: Well, in the scenario that your staff did, most of the time. So that's the 10	Please see Master Response 2.1, Amendments to the Water Quality Control Plan, regarding the geographic scope of the plan amendments and the Upper San Joaquin River. Please see Master Response 2.1 regarding the unimpaired flow contribution of different parts of the San Joaquin River Watershed and the Delta Flow Criteria Report's use and calculation of unimpaired flow.

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		number, because you get Kings River, you get Tulare Lake, you get Upper San Joaquin. So, they took the whole unimpaired and shoved it down into the river, the whole deal. So, if you're at 10, now you've cut the watershed, you've cut 40 percent of the watershed off and you're down at 60 percent of the watershed. And, then, what you did again is you said, okay, well, we're going to--I'll use 30. So, 30 times 6 is 1.8. So, in your Delta Flow Criteria Report, this was what Doug Obegi was trying to say, and I agree with him entirely. He said, wait, you told us the number was 6 at Vernalis. Now, I'm going to get 1.8. 1.8 isn't going to substantially improve fall-run Chinook salmon, nor is it going to reach the doubling goal. So, the question is, then, if you're not meeting your goals, then why are you sending the water down? I think it's really important, and the switch here is, if you made these requirements [ATT1:ATT28], think about it, so let's go and say you want to--let's agree that the Delta Flow Criteria Report is correct. If you needed 10,000 CFS at Vernalis, to reach the doubling goal in the San Joaquin River, from these three tributaries, that would roughly equal 3 million acre-feet a year. Well, the total runoff in the three tribs is 3.7. So, you can't get to your doubling goal from here, and from these tributaries. That's why there's this disconnect. It's kind of the same disconnect that we're having in June. Yeah, you can get fish out in June, and there is a time and a place in how you can do that. But if you try to do it all the time, the water cost gets really high. And when you're trying to look at if that's truly 45 or 50 percent of the impacts, and we're going to supply you with the numbers on that. Your staff's number, I don't know how they came up with it because they talk about diversions. And I don't know if they're talking about diversions just to the canal gates, or diversions to the canal gates into storage. We should look at that and talk about it. So, those are two instances where I think we need to start bringing our discussion to bear about how it is we're going to achieve certain goals in your plan, that you're looking to achieve, and whether or not how we're setting this up gets us there. And then, part two is I think we should disclose to people what the impacts are. And then, based on the impacts, we can figure out how you want to move the Plan, or how we can move the Plan to provide reasonable and beneficial protections to the fisheries into the Delta. And that's the pitch.	
856	16	[ATT1: San Joaquin Tributaries Authority presentation]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	17	[ATT1:ATT1: Table 3: Objectives for Fish & Wildlife]	The commenter is providing this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	18	[ATT1:ATT2: Narrative Objective]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	19	[ATT1:ATT3: What are the expected impacts of the Plan?]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	20	[ATT1:ATT4: No analysis of 30%-50% UIF in the SED]	The commenter provided this attachment for reference purposes in support of their comments. Those

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856	21	[ATT1:ATT5: What was modelled in the SED?]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	22	[ATT1:ATT6: What Plan is currently under consideration?]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	23	[ATT1:ATT7: Impacts on storage under true 40% UIF]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	24	[ATT1:ATT8: New Melones Storage, Current]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	25	[ATT1:ATT9: New Melones Storage, SED Results]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	26	[ATT1:ATT10: New Melones Storage, True 40%]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	27	[ATT1:ATT11: Why is the true 40% UIF not in the SED?]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	28	[ATT1:ATT12: What if the real Project had been modelled?]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	29	[ATT1:ATT13: If the Project is not feasible without non-plan components, then what is the proposed solution?]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	30	[ATT1:ATT14: State Water Board Proposed Solutions]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	31	[ATT1:ATT15: The proposed solutions do not work]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	32	[ATT1:ATT16: The Plan is not done]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	33	[ATT1:ATT17: What are the stated benefits to fisheries?]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	34	[ATT1:ATT18: What is the stated benefit to fisheries?]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	35	[ATT1:ATT19: What is the stated benefit to fisheries?]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	36	[ATT1:ATT20: Staff is backing away from SalSim]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	37	[ATT1:ATT21: What are the benefits to fisheries?]	The commenter provided this attachment for reference purposes in support of their comments. Those

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			comments are addressed in these responses to comments; therefore, no additional response is required.
856	38	[ATT1:ATT22: What are the benefits to fisheries?]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	39	[ATT1:ATT23: Chinook Salmon Passage]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	40	[ATT1:ATT24: A bait-and-switch on unimpaired flow]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	41	[ATT1:ATT25: The Bait]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	42	[ATT1:ATT26: Average San Joaquin River flow at Vernalis]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	43	[ATT1:ATT27: The Switch]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	44	[ATT1:ATT28: The Switch]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	45	[ATT1:ATT29: Transparency Issues]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
856	46	[ATT1:ATT30: Transparency Issues]	The commenter provided this attachment for reference purposes in support of their comments. Those comments are addressed in these responses to comments; therefore, no additional response is required.
857	1	Whatever happens with water distributions up north flows down throughout California. Those are the true impacts. But more importantly is that our communities, our businesses, our Central Valley agricultural community has not chance of survival with your current plan. There is no chance. Our Golden State has become a brown state, and we're losing jobs, not just in the fields, in the farming, in the processing plants. Our economy, our workforce in Santa Nella is seasonal employees making minimum wage. They're the most impoverished, challenged residents, our community that has to deal. Whenever there's a water shortage, they know their season is going to be shortened by a month or two, and that's their livelihood. The majority of those families in part of Merced County, the western region of Merced County, are the ones that are living below minimum wage standards because a lot of them have other issues going on, and also the hiring practices.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
857	2	The water in our Central Valley, we need to have the stakeholders at the table. They have to represent all silos that we currently have, because that's what it is, you're working in silos. We have to have that partnership, because right now there is not dialogue, sharing of information, sharing of research data so we could come to a middle ground. It's either your ground or the low ground, and we don't want that. We don't need to get into battles. We need to use our energies to be proactive, make it a win-win situation and meet the middle ground.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

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		The proposal right now, we need to have really comprehensive alternatives. The stakeholders have to be part of that dialogue. They have to be engaged and they have to be listened to, and also be part of the written document. Don't actions speak louder than words? We have to be part of that written document, that's our presence, not just having a meeting, check, it's been done because of formality. No. We need to have our voices in those documents.	
857	3	Also the win-win situation is this plan has to address the predator suppression, the habitat restoration. Work with the fisheries and mitigate the measures that have to be written in the document, and also in the State Plan. If you don't have that written, it gets lost in the air or people forget the history or the voices.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
857	4	Everybody here, please stand up. Please stand up, everyone, please. Please. We've got to show them. These are not just voices. These are the people that help run California's agricultural community. And we are here to work with you. We're not going anywhere. We're staying here, and this is our right. But you need to work with us, that is vital.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
857	5	Without that, our drinking water is the other issue. We have to blend our water because of chromium-6. No one has talked about the drinking water issues in Central Valley and Merced County. We have issues with chromium-6, and we had to purchase water at $30,000 this past year. We're only 532 accounts, only two wells, a population of 1,308 people. ow can these small water districts that are not part of major cities in unincorporated communities, how can we survive if we don't even have the water to provide our schools, our families, our town's drinking water that's safe because of the chromium-6 issue in Volta and other parts of this state of ours? And that's one thing that hasn't been even addressed is the safe drinking water because of chromium-6.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
857	6	I'm wishing that you work with us, that you don't hear us but you have us at the table, and that we're not going to go anywhere. We will be here and we want to work with you, but you need to come visit us in our neck of the woods. You're here in Merced, but you need to go visit Volta. You need to go visit the small districts. We're not Marin County or San Francisco or the Marina District. My family lives -- some of them live there. But we understand the need for Central Valley, because I live here, and I'm not going anywhere.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
858	1	I'm attending today what I feel to be a funeral for me and all the people here. It feels like I'm attending my own funeral. So I deplore you people to consider what's being said here today and use the correct scientific data and listen to our scientists and our attorneys. It's very important that you don't just come here to meet the obligation to listen to us then put it in a filing cabinet for later, but to take what we have serious and to understand that this may be the epicenter of the ground floor for your water war.	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.
859	1	When I came and spoke in Sacramento, on the 29th, I left off with a cost benefit analysis that basically said we need to look at what we're gaining versus what we're giving. I want to get a little bit more granular and zoom in, today, on Merced and the Merced River, specifically. I think what you've heard today, and seen in the presentation from MID, and others, is that the fish that come out of the Merced River represent an incredibly small portion of the holistic picture. Less than 2 percent of the salmon population comes from this	Please see Master Response 1.1, General Comments, for responses to comments that either make a general comment on the plan amendments or do not raise significant environmental issues.

Table 4-1. Responses to Comments			
Ltr#	**Cmt#**	**Comment**	**Response**
		river. Yet, it's the water that comes down this river has, relative to the other systems, a disproportionate economic impact. So, my main point today was just to add on that, basically, every percent increase in unimpaired flows out of Merced River, specifically, not out of the region, has an incredibly economic cost relative to a very, very small benefit to fish.	