

March 29, 2013

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



Re: Comment Letter on the proposed Bay-Delta Plan SED

To Whom It May Concern:

We are writing this letter on behalf of Merced County Farm Bureau (MCFB), the leading agriculture organization in Merced County. MCFB represents over 1,500 farmers and ranchers in Merced County. We have been in existence since 1917 with the purpose of improving the ability of individuals engaged in production agriculture to utilize California's resources to produce food and fiber in the most profitable, efficient and responsible manner.

We submit this letter to voice our strong opposition to your Draft Substitute Environmental Document (SED) for the Bay-Delta Plan, and to request a revision to the SED so that non-flow alternatives are recognized and prioritized. Other alternatives, like predation programs or new reservoirs will provide greater benefits and protections for fish, and should be put in place before demanding more flow from economically distressed rural areas.

If approved, the proposal in your Bay-Delta SED will require the Merced, Tuolumne, and Stanislaus rivers to dedicate 35 percent of unimpaired flow to fish and wildlife will devastate San Joaquin, Stanislaus and Merced Counties in a number of ways. It bears repeating and additional concern that this proposal does not include a fixed number. Instead groups will annually have the ability to petition the board, requesting adjustments between 25 and 45 percent. The full scope of impacts to our region has not been fully realized because of this stipulation.

Farmers and ranchers will obviously feel the pain if this action is taken by the State Water Resources Control Board (SWRCB). However the most extreme effects will be felt in our struggling economy since we have continued to face significant challenges with poverty, unemployment and foreclosures. Merced County cannot afford further mandated droughts where our member's fallow land resulting in several hundred jobs lost, subsequently losing tens and sometimes hundreds of millions of dollars annually from agricultural income which supports this region.

Furthering our concern is the already existent and troublesome subsidence that exists in Merced County mainly due to over-drafting of the groundwater basins. It has created a major flood hazard for the impacted areas as well as created significant damage to existing operations. This proposal will force ag businesses to tap into these basins which are already strained and in dropping annually. Surrounding municipalities and communities who support over 125,000 people exclusively rely on groundwater as a source of drinking water. Now you are demanding our rural landowners tap into the same resource which will force them to compete with these communities, or fallow land to keep their family farms a sustainable business. Agriculture is one piece of a united county and we should not be competing for resources that will ultimately destroy our communities.

During the public hearing for the SWRCB on March 20, 2013, staff explained in the SED the economic analysis assumed no usage of groundwater while the environmental study assumed full expansion of groundwater usage by farming entities. Although the economic impacts do not have to be as thoroughly studied as do certain environmental subjects in California Environmental Quality Act (CEQA), our community deserves to understand the full ramification for a proposal such as the SED. With the inclusion of groundwater into the economic section, staff must also consider the economic impacts caused to farmers who currently rarely pump and enjoy an exemption from the San Joaquin Air Pollution Control District due to their limited uses. With this increased of pump usage many will be required to purchase new and expensive gas or electric pumps to adhere to state standards which will be a great cost to the landowner.

We also have serious concern that this proposal will devastate the hydropower production in our region by taking water from reservoirs during the spring, leaving less water available during the summertime when there is a critical need to relieve strain on the state's power grid. Without the opportunity or consideration of increase storage capacity in our reservoirs, or even new reservoirs, it increases the likelihood of a summer drought and energy issues which will be detrimental to the entire community.

This proposed plan is based on an assumption that it will help restore the Delta's native fisheries, but this assumption is not supported by science or evidence. Rather, the proposal presents unilateral demands without quantifying the benefit or goal to be achieved. Before imposing a plan that carries such serious consequences, the Board must first implement non-flow measures. Given the scarcity of water in California, non-flow measures such as additional reservoir capacity or predator suppression must be put in place before the State Water Board puts local family farms out of business.

We strongly urge the Board to reject this proposal.

Sincerely,

Board of Directors
Merced County Farm Bureau