



March 18, 2013

To: California Water Resources Control Board
From: Dave Baker, Director, Member Relations, Blue Diamond Growers
Mel Machado, Special Projects Coordinator, Blue Diamond Growers
Re: Comment Letter----Bay-Delta Plan SED

This letter is written in opposition to the Bay-Delta Plan Substitute Environmental Document. The plan to direct 35% of the unimpaired flows from the Merced, Stanislaus and Tuolumne Rivers from February 1st through June 30th to fish and wildlife uses, if approved, will be devastating to the agricultural base of northern San Joaquin Valley. By the Board staff's own admission, the diversions will result in "significant and unavoidable" impacts

The potential impacts from this course of action are numerous. Impacts to agriculture include:

1. Reductions in water deliveries could require up to 210,000 acres being fallowed in dry years.
2. Agricultural sector income loss could total \$187 million a year during dry years, a major hit in a region stuck in a lingering recession.
3. With less water and power available, rates for both would rise, further straining households.
4. Job losses would exceed 1,200 in dry years, exacerbating unemployment, which stands at 15.7% in Merced County, 14.5% in Stanislaus County and 14.1% in San Joaquin County.
5. Two districts (Modesto and Turlock Irrigation Districts) will sacrifice 300,000 acre-feet of water annually.

The proposal also undermines efficient power generation by the region's hydro-electric facilities and increases farmer's reliance of deep wells. The following points must be considered:

1. Increasing flow from February to June generates more energy at a time of low energy demand.
2. Less water in reservoirs in summer means less hydropower at time of peak demand.
3. Cuts in hydro production create a need to buy costly supplemental power from carbon-producing conventional sources, undermining California's goal of 33% of energy from renewable resources.
4. To account for lost surface water, users will increase pumping of groundwater by approximately 25 percent, placing additional stress on the water table, as well as increasing energy use and costs.
5. Hydropower is a valuable contributor to reaching California's goal of 33% renewable energy because it is highly flexible; unlike hydro, wind and solar cannot be generated on demand.

While the costs of implementing this poorly conceived plan are many, the benefits have not been defined. Beginning with the Central Project Improvement Act, CVPIA, in 1992, water has been increasingly diverted to fish and wildlife uses through the application of Biological Opinions and regulatory decisions. Yet, we are told that the species continue to decline or at least have not rebounded as desired. Common sense would indicate that the numerous actions employed since the implementation of the CVPIA should have provided some impact if flow rates were truly the problem.



Suppression of predatory species has not been employed even though the decimation caused by their feeding has been documented. Instead, sports fishing interests have in a sense protected the predators. Excessive ammonia levels released into the Sacramento River by the City of Sacramento water treatment facilities are also documented, yet the releases continues, supposedly due to the cost of improving the treatment facilities.

Details of the years of work dedicated to the development of the Bay-Delta Conservation Plan, BDCP, are just now beginning to be known. The BDCP has been championed by many of our state leaders, from both political parties. The Bay-Delta Plan SED undermines support for the BDCP after many years of work.

Some say that water could be made available if only farmers would employ water saving practices. However, those holding this opinion are uniformed of the methods farmers have already adopted. Growers have widely embraced methods of monitoring soil moisture levels within the fields and mapping the needs of the crop against the available water. Low volume irrigation systems are widely used to meter water to the crop as needed, maintaining soil moisture at optimum levels while reducing evaporative losses. Crops are supplied with the water they need to meet the requirements of optimum plant growth, thereby increasing yields at the lowest possible water consumption. These methods have been widely adopted, negating the claim that additional supplies of water could be made available through conversation.

In the 2013 crop San Joaquin, Stanislaus and Merced Counties produced a total of 522.4 million pounds of almonds. Surely, a significant proportion of this amount was grown within the boundaries of the area that will be impacted by the proposal. Blue Diamond Growers within the past year increased its commitment to the almond growers in the area by building a new processing facility in the heart of this region, west of Turlock. In doing so, we recognize the importance of the three county area to the California almond industry.

We strongly urge the Board to reject the Bay-Delta Plan SED and find other, non-flow alternatives.

Sincerely,

Dave Baker
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Blue Diamond Growers

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Blue Diamond Growers