

INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, AFL-CIO

**IBEW**



**LOCAL UNION 1245**

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VIA ELECTRONIC MAIL

March 28, 2013



Members of the State Water Resources Control Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, California 95814-0100

RE: **State Water Resources Control Board SED for the Water Control Plan for the Bay-Delta Estuary; San Joaquin River Flows and Southern Delta Water Quality**

Dear Members of the State Water Resources Control Board:

Thank you for permitting the International Brotherhood of Electrical Workers to provide comments on this matter before you.

The IBEW represents over 20,000 members working for utilities in Central and Northern California and Northern Nevada, including workers at Merced Irrigation District, Modesto Irrigation District, City and County of San Francisco Public Utilities Commission, South San Joaquin Irrigation District, Tri-Dam Project and Turlock Irrigation District.

Our members working for these agencies are proud to deliver irrigation water to tens of thousands of farmers, deliver drinking water to millions of Northern California customers and provide electric service to hundreds of thousands of San Joaquin Valley residents.

We oppose the proposed the SWRCB recommendation to increase the water flows in the Merced, Tuolumne, and Stanislaus rivers by up to 35 percent between February 1 and June 30 each year. Doing so would divert critically needed water from those residential and commercial users and workers that depend on it and reduce the amount of greenhouse gas emissions-free electricity currently generated.

Specifically, this proposal will COST JOBS – the jobs of dozens of our members working for these agencies. Worse, if implemented as written the SED could cost as many as ten thousand jobs of other workers in the San Joaquin Valley and the greater San Francisco Bay Area, at a time where unemployment remains disturbingly high in the Valley – above 20% in numerous areas.

This level of general job loss would absolutely cause further adverse impacts to a wide variety of IBEW employers, threatening even further job loss for our members. Should this proposal result in a 20% shortage of water, the agencies responsible for delivering water estimate the economic impact would reduce commerce in these affected areas by between three and four Billion dollars.

For our customers, the increased flows in the spring would result in less water being available in the heat of summer for hydroelectric power generation when we need it most. The sun does not stop shining and the heat does not relent simply because there is less water for hydropower. This lost power must be replaced — with electricity that is higher cost and generates much higher greenhouse gas emissions.

This reduction of water availability will have a devastating effect on groundwater supply through increased pumping for the many low income communities that rely exclusively on groundwater for their drinking water. The effect of this increased pumping will be to permanently deplete the water table, increase electricity use and place a basic necessity of life for tens of thousands of residents of the Central Valley that have no other options.

The loss of hydro power will also make it more difficult for California to reach the 33% energy from renewable resources by 2020, a fundamental step in cleaner power and air. Hydro power can be generated on demand and helps to balance intermittent renewable resources like wind and solar.

Bottom-line: Should this proposal be adopted, it will hurt IBEW members, hurt San Joaquin Valley and San Francisco Bay Area workers of all types, and hurt the agencies that serve thousands of Valley residents, threaten the water supply for thousands of disadvantaged and impoverished families and undermine California's clean energy goals.

We urge the SWRCB to reconsider the 35% average unimpeded flow proposal and urge legislators and regulators to fully consider the multitude of non-flow alternatives that exist and balance these approaches with the economic harm that this proposal would cause if enacted.

Respectfully,

s/ Hunter Stern

Business Representative