



**AGRICULTURAL COMMISSIONER'S OFFICE AND  
SEALER OF WEIGHTS & MEASURES**

**Milton O'Haire**  
Agricultural Commissioner/Sealer

✓ BOARD OF SUPERVISORS

2015 APR 23 A 10: 11

3800 Cornucopia Way, Suite B  
Modesto, California 95358  
Phone: 209.525.4730 Fax: 209.525.4790

April 22, 2015

The Honorable Terry Withrow  
Chairman, Stanislaus County Board of Supervisors  
1010 10<sup>th</sup> Street, Suite 6500  
Modesto, CA 95354

Dear Chairman Withrow,

During the February 2015 meeting of the Agricultural Advisory Board (AAB), Herb Smart of the Turlock Irrigation District provided an update of the State Water Resources Control Board's Bay-Delta Plan - Phase 1.

Phase 1 of the State Water Resources Control Board's Bay-Delta Plan seeks to address 'San Joaquin River Flow and Southern Delta Salinity.' As part of Phase 1, the State Water Board's Draft Substitute Environmental Document (SED) was released in December 2012. The SED's preferred alternative proposes that the Merced, Tuolumne, and Stanislaus rivers each dedicate 35 percent of the river's unimpaired flow for environmental benefits from February to June each year to benefit salmon and salinity. Currently, the State Water Resources Control Board staff plan to issue an updated SED in spring 2015, and it is anticipated that its preferred alternative as a percentage of unimpaired flows will increase.

Requiring 35 percent of unimpaired flow on the Merced, Tuolumne and Stanislaus rivers from February to June has the potential to have catastrophic effects on the region. Because agriculture production, agriculture processing and agriculture-related businesses are the cornerstone of our region's socioeconomic vitality, this proposal to reallocate significant water resources to other beneficial uses is a dual threat to our region's farms and communities in several ways.

It is not clear if more water released as instream flows on these three tributaries will achieve environmental benefits in the San Joaquin River and Bay-Delta, but what is known is that such a water reallocation would have a ripple effect in Stanislaus and Merced counties.

Based on the analyses in the SED, following in the two-county region served by the tributaries in dry years could surpass 200,000 acres. In dry years, the same regional could see agriculture sector income loss of approximately \$187 million and potential job losses of 1,200.

Mr. Smart also addressed the negative effects this plan would have on long-term groundwater sustainability, domestic drinking water supplies to cities, economically disadvantaged communities and the district's ability to economically supply power to its customers, many of whom are farmers and rural residents.

Following Mr. Smart's presentation, the AAB voted unanimously to recommend to the Board of Supervisors that your Board consider supporting local water districts by expressing "concern" for the potential economic and socioeconomic effects of the implementation of unimpaired flows in excess of 35%. This letter serves as that request.

Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Orvis". The signature is fluid and cursive, with the first name "Tom" and last name "Orvis" clearly distinguishable.

Tom Orvis  
Chairman, Stanislaus County Agricultural Advisory Board