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OID, SSJID: State's plan for river flows fails to reconcile modern science with regional economic needs

The State Water Resources Control Board announced July 6, 2018, that it is doubling down on its intent to divert billions of gallons of water a year from the Stanislaus, Tuolumne and Merced rivers. Its plan ignores our regional concerns, our 24 years of ecosystem science and our ideas for responsible resource management.

The state's revised Phase 1 Substitute Environmental Document would flush 300,000 acre-feet of water down the three rivers – enough to serve about 1 million families – in a myopic and scientifically unsupported effort to create an additional 1,103 salmon a year and improve water quality in the Delta.

The water board took nine years and spent more than \$70 million to create its plan, then completely ignored near unanimous opposition from people in our area -- regional water experts, business and political leaders, organizations representing farmers, independent economists and average citizens.

The public hearings in Modesto, Merced, Stockton and Sacramento were attended by thousands of people. Most strongly objected to the proposal. During the six-month comment period, the water board estimates it received 10,400 written and oral comments.

"No significant changes have been made to the proposed plan amendment," is how the water board summarized the value of the feedback it received.

Apparently, none of our voices mattered. The five water board members didn't listen.

The Oakdale and South San Joaquin Irrigation Districts – who share historic water rights on the Stanislaus River – participated in more than three years of "settlement" negotiations with the state. We shared with state officials 24 years of hard science about the Stanislaus River, yet no changes were made.

"It is an economic gut punch for our region," said Steve Knell, OID's general manager. "All our meetings were apparently just a 'check-the-box' requirement in their regulatory process. Ten thousand comments from our region and not one change to the original document? Really? Tell me this document wasn't cooked and baked years ago. This just stinks!"

"It is unfortunate that so much of the practical water management history and empirical fisheries science our districts and other water agencies have developed on our rivers has been disregarded," said Peter Rietkerk, SSJID's general manager. "The state water board has failed to produce a plan that seeks viability for both local fisheries and the regional economy."

The state's plan acknowledges that it could result in what many call a "regulatory drought," when supplies for people, agribusiness and recreation are limited even in average rainfall and snowfall years.

"The model results indicate that implementing the lower San Joaquin River alternatives would result in more years with drought conditions (i.e., reduced water availability and thus reduced water supply diversions)," the SED says.

The document also continues to refer to the economic consequences as "significant and unavoidable" without offering any ideas to mitigate them. That's unacceptable.

An economic analysis prepared for the region and sent to the state in March 2017 shows:

- The plan is an economic catastrophe for San Joaquin, Stanislaus and Merced counties. The analysis forecasts an economic loss of **\$12.9 billion** in the first year higher flows would be required. The state's plan minimizes the regional economic impact at \$106.2 million.
- Ag and residential customers in the OID and SSJID service areas face 20% annual reductions (from a combined 600,000 acre-feet to 480,000 AF) in water allotments during "normal" years; cuts would be more severe during times of drought. The districts would go from 535,000 AF to 236,000 AF in "dry" and "critically dry" years.
- New Melones Reservoir would go dry 12 times out of every 95 years.
- Groundwater pumping across the region would increase dramatically, to as much as 1.57 million acre-feet in sequential dry years. The state estimates cities and farmers would only pump 105,000 acre-feet a year.
- More than 132,000 acres of farmland would be fallowed across the region because surface water deliveries would be lost or reduced and growers with access to groundwater couldn't afford to pump it. The state's estimate is less than 24,000 acres.
- OID and SSJID would forfeit key revenue streams that help keep rates affordable for all our customers. Combined, there would be a loss in the ability to produce as much as \$10 million in clean hydroelectric power a year from facilities at New Melones and Tulloch reservoirs. In addition, there would be no opportunity to transfer surplus surface water from our districts to other water agencies, a \$3 million to \$5 million annual hit for each district and a reduction in critical water supply to meet local and statewide water user needs.

About Us: The <u>South San Joaquin Irrigation District</u> was established in 1909 and is located in Manteca. It provides agricultural irrigation water to about 55,000 acres in Escalon, Ripon and Manteca. In 2005, the district began providing wholesale domestic water service to various cities within San Joaquin County. The <u>Oakdale Irrigation District</u> was created in 1909 and provides agricultural water to about 62,000 acres in northeastern Stanislaus County and southeastern San Joaquin County.

OID and SSJID hold senior water rights on the Stanislaus River. For more than 100 years, our agencies have responsibly delivered surface water to farms in San Joaquin and Stanislaus counties, and for SSJID, thousands of homes in San Joaquin County. We are committed to sensible water policies, innovative

irrigation techniques, prudent conservation practices, and important investments in biological studies of the river and fish habitat.

Save the Stan is a public education effort by SSJID and OID to inform Californians about the threat posed by increased flows on the Stanislaus River. For more information, go to <u>www.savethestan.org</u> or our <u>Facebook page</u>.