

Merced County Office of Education

Steven E. Gomes, Ed.D., Superintendent



June 22, 2015

Felicia Marcus, Board Chairwoman
State Water Resources Control Board
PO Box 100
Sacramento, CA 95812-0100

Dear Chairwoman Marcus:

As the Merced County Superintendent of Schools, I am responsible for the administration and oversight of a countywide school system that serves 70,000 pre K-12 students, with 20 districts and 10 facilities directly under county school authority. As you may also know, Merced County is one of California's most economically and educationally challenged areas. It is also among the fastest growing regions of our state.

In 2012, the State Water Resources Control Board released to the public a suggested range for increasing the unimpaired flows of the Merced, Tuolumne and Stanislaus rivers. This report went to extensive length to discuss impacts to groundwater. For your information, Merced's drinking water is all groundwater based.

The report concluded that the impacts to the groundwater basin were "significant, but unavoidable". Ms. Marcus, this legal wordsmithing completely fails to describe the devastation that the implementation of this plan would have on the thousands of people who live in Merced County, send their kids to school here, and who hope to prosper here.

The SWRCB has not talked to us about the impact the Board's plan would have on our specific mission of educating local youth and providing services like Head Start designed to give a chance to children who would have little chance otherwise. To my knowledge the SWRCB has not sponsored a workshop for Merced County citizens, the people most impacted by SWRCB's proposed action

We have taken a close look at the Board's 2012 plan. The proposed action is frightening and is silent regarding the long term consequences.

The report's groundwater pumping provisions include unrealistic assumptions. It declares that any increase in groundwater pumping resulting from increased municipal or industrial use would be offset by diversions in surface water use for irrigation. In other words, no net increase in groundwater use unless there is a reduction in surface water irrigation use. The report estimates that, even with this assumption, the flow increase would result in groundwater pumping increases of 15% in the Merced sub basin, a 25% increase in Turlock sub basin and a 28% increase in Modesto's (pg. 9-24—mid range alternative of 40%). All this on top of drought fueled groundwater pumping increases, which are not addressed in your report.

Our school facilities operate on well water or city fed well systems. Some have received warning notices from the SWRCB's drinking water quality division regarding the safety and adequacy of their water supply. Our schools will be responsible for enormous repair and relocation costs for thousands of students, and places a large financial hardship on low socio-economic status parents if water quality is severely diminished. A recent survey I conducted of our school administrators suggests that several will face near term drinking water quality emergencies. The Board's action would make that reality a commonplace occurrence in Merced County.

The state environmental review process is supposed to address such issues. If local government, or any private developer, proposed to alter for the worse the quality of life in an entire community or region, mitigation would be required. Yet no one from the SWRCB has discussed these very real problems with us.

Last year California enacted groundwater sustainability legislation. All groundwater basins must reach sustainable levels. Without mitigation or even a comprehensive impact analysis, the SWRCB's proposal is to increase the drain on this area's basins significantly. Even UC Merced's expansion to 10,000 students (from the current 6,600) could be jeopardized if water quality and availability come into question.

Will you and your technical staff and planners come to our area and meet with our school staff to take a serious and realistic look at what your proposal will do to our area and our people? The SWRCB has spent millions of dollars in developing this plan. I am sure much time has been spent in discussions with the proponents of a massive flow increase, and with the irrigation districts who oppose the plan. To my knowledge little effort has been made to reach out and discuss the proposal with the people whose quality of life is directly impacted and irrevocably altered. It was my belief that the SWRCB would meet with the people most impacted by this plan. In checking with our schools and cities, I understand that no such effort has been made.

The sheer magnitude of the proposed water reallocation requires a much greater and more inclusive outreach effort by the SWRCB. The reallocation of our water resources potentially represents the second largest reallocation of water from one beneficial use to another in California history, next only to the 1992 CVPIA reallocation of 800,000 acre feet annually. But that reallocation was absorbed by a service area and diverse economy of over 10 million people. In this case, we are talking about 800,000 people with one single significant economic driver, agriculture.

My great grandfather brought his dairy farm business to the San Joaquin Valley at the turn of the century because irrigated crops made farming a more viable business in California. My family has been in Merced County ever since and I want future generations to have the opportunity to thrive and raise their families in Merced County.

I look forward to your response.

Sincerely,



STEVEN E. GOMES, Ed.D.
Superintendent of Schools

SG:lw

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Senator Barbara Boxer
Congressman Jim Costa
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