

July 9, 2015

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

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Dear Chairwoman Marcus:

I am the new Chief Executive Officer of the Stanislaus Business Alliance, the lead economic development organization in Stanislaus County. The Stanislaus Business Alliance is charged with giving job seekers opportunities for employment. Our organization also serves the needs of entrepreneurs in Stanislaus, Merced, Mariposa and Tuolumne Counties. On behalf of our board and our Government Affairs Council, I am writing you to express our deep concern to your Substitute Environmental Document for the Phase One of your Bay-- Delta Water Quality Control Plan. The proposal on the table would hurt our efforts to grow and diversify our local economy and therefore have a long term negative impact on our citizens who are in most need of economic advancement.

Water is the lifeblood of our economy in Stanislaus County and throughout our entire region. UC-Davis conducted a study this past year and stated that Stanislaus County trails only Los Angeles County in the entire state in food production. Food production is a multi-billion dollar industry in our county and adds tremendous value to the State of California, the eighth largest economy in the world. Tens of thousands of people are dependent on jobs in agriculture, food processing and its related industries. Our businesses pay millions of dollars in taxes each year to sustain our state government.

We are a county that has struggled to enjoy the economic recovery that most of the state has enjoyed for quite some time. Stanislaus County consistently has one of the highest unemployment rates in California. Our unemployment rate stills hovers around 10 percent. More than a quarter of our citizens fall under the poverty line. In a serious drought where the entire state's economy is being threatened, we think it would be prudent to safeguard those industries that provide jobs and economic value to the state.

There has been little collaboration and discussion with those who would be most impacted by the Board's Phase 1 flow objectives to this point. We are proud citizens of this state, and we would like our voices to be heard and our opinions to be considered, so that we can find mutually acceptable solutions to the water usage in the Bay--Delta region.

Your current recommended course of action would increase groundwater pumping by 25 percent in the Turlock sub basin and by 28 percent in the Modesto sub basin. This would happen in a severe drought situation and before groundwater sustainability plans and programs are adopted. Moreover, your

formula states that "increased demands for municipal water would be generally supplied from baseline agriculture diversions for the developed land, not additional groundwater supplies." That statement alone makes it almost impossible for our counties to grow, or more people and companies to move here or open up new businesses. In a county that desperately needs new jobs, this is unacceptable.

We implore you to send staff to meet with us and come up with a commonsensical approach to this situation. We have worked hard to be good citizens and lower our water usage in the face of this drought. In fact, the Central Valley has led the state in water conservation efforts while some regions have actually increased their consumption. We have been open-minded, respectful and amicable in the Administration's goals to conserve and enhance our waterways while maintaining and supporting a vital industry in our state – agriculture and food processing.

Like others have said, we cannot achieve groundwater sustainability without surface water. We ask that you please consider our needs in the Central Valley with others' needs and wants. We are part of this state. We add value to this state. And we ask that you listen to and respect our challenges and opinions. Please let me know how we can convene a meeting of those interested parties who want to preserve our economy while conserving and enhancing our vital surface water resources.

Best regards,



David L. White
Chief Executive Officer
Stanislaus Business Alliance