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STANISLAUS REGIONAL WATER AUTHORITY

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June 26, 2015

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

Dear Chairwoman Marcus:

I write to you and your board in two capacities, as Mayor of Ceres and a Chair of the Stanislaus Regional Surface Water Authority. I want to take strong exception to your substitute environmental document for the Bay Delta water quality control plan. Since publication of this report in 2012, your board has failed to engage significant elements of this community in the discussion of the destructive nature of your recommendations and has failed to listen, learn, and modify an unreasonable and extreme report.

Your reports' introduction pages suggest that there was little discussion with the authorities in Stanislaus and Merced counties who are actually responsible for providing drinking water to the 800,000 people who live here. With the exception of part of Modesto, all the residents in this area rely on groundwater for drinking purposes. Safe and available groundwater is essential to our public health and our economic health.

You recommend a course of action that will increase groundwater pumping by 25% in the Turlock sub basin and 28% in the Modesto sub basin. You would do this before groundwater sustainability plans and programs are adopted, and you would do this before the area has even begun to recover from the drought.

Even worse, your baseline formula states that "increased demands for municipal water would be generally supplied from baseline agricultural diversions for the developed land, not additional groundwater supplies." Not only do you propose to take hundreds of thousands of acre feet of water annually from our reservoirs, but you assume even more irrigation water would be lost if our population were to grow at all.

This is one of California's fastest growing areas. We are dependent on groundwater. Your plan eliminates our best source for recharging the basin.

In Ceres, as elsewhere in our communities, we have to deal with the increasing costs of maintaining drinking water quality for our residents. You would make this challenge much more difficult.

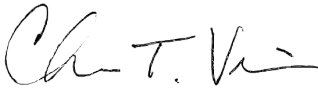
Will you commit to sending your staff and technical experts to meet with our engineers and managers so that we can understand more specifically what you mean by "significant but unavoidable" impacts to our groundwater?

It does not strike me as unreasonable to expect a more inclusive and comprehensive outreach program.

One more point. One District (the Modesto Irrigation District) supplies surface water for drinking to parts of the city of Modesto. The Turlock Irrigation District has committed to supplying surface water to the people of Turlock, Ceres and south Modesto. Your flow proposal effectively destroys that plan and wastes the millions of dollars that have been spent in its development. Your report does not discuss this impact at all.

We cannot achieve groundwater sustainability without surface water. Your radical redirection of irrigation water condemns this area to a century of poverty, joblessness, and most importantly lack of opportunity. Please direct your staff to meet with our officials so that you can learn about the local circumstances in more detail. I look forward to your response.

Sincerely,



Chris T. Vierra
Mayor of City of Ceres
Chairman, Stanislaus Regional Water Authority