



GENERAL MANAGERS ADMINISTRATION

MEMORANDUM

TO: Board of Directors

DATE: September 29, 2016

PREPARED BY: Casey Hashimoto

RE: State Water Resources Control Board's (SWRCB) Phase 1 Revised Draft Substitute Environmental Document

Action Requested

Resolution outlining the Turlock Irrigation District's opposition to the State Water Resources Control Board's (SWRCB) Phase 1 Revised Draft Substitute Environmental Document and requesting the SWRCB pursue a comprehensive solution that prioritizes non-flow measures to protect native fish species before requiring flow increases that would threaten the economic vitality of our region.

Discussion

The Bay-Delta Plan is required by law to be updated every three years by the State Water Resources Control Board (SWRCB). The goals of the Plan are to identify beneficial uses of water, set water quality objectives for the Bay-Delta and set a program of implementation for achieving those water quality objectives.

In order to analyze the potential impacts of its proposal, a Substitute Environmental Document (SED) has been developed by the SWRCB in lieu of a California Environmental Quality Act Environmental Impact Report. Specifically, the SED is the mechanism that is proposing and analyzing new objectives for the Bay-Delta, as well as identifying potential impacts.

The State Water Resources Control Board's Bay-Delta Plan, Phase 1 Draft Substitute Environmental Document (SED) issued in December 2012 proposed to require the Stanislaus, Tuolumne, and Merced rivers release 35 percent of unimpaired flows from February to June each year for environmental benefit. The State Water Resources Control Board, after a two-day hearing in March 2013 regarding the adequacy of the SED, decided to revise the analyses and recommendations provided in the Draft SED, with the ultimate intent of bringing a final SED and to its Board for adoption at a date to be determined.

Revised Draft SED was issued on September 15, 2016 and is currently being circulated for public comment. The revised draft proposes to require the Merced, Stanislaus and Tuolumne rivers release 40 percent unimpaired flows from February to June each year for potential environmental benefit.

Flows described in the SED will create “significant and unavoidable” lasting impacts that will harm the socioeconomic welfare of those within Stanislaus, San Joaquin and Merced counties. Water supply impacts of flows described in the SED include the loss of hundreds of thousands of acre-feet of surface water that is used to keep agriculture—the region’s economic engine—stable. This loss of water would result in the fallowing of some of the most prime farmland in California.

If the SED’s unimpaired flows were in effect in 2015, in addition to already-incurred impacts from the fourth year of a drought, the economic impacts of the SED would have included \$1.6 billion in economic output loss, \$167 million farm-gate revenue loss, \$330 million in labor income loss, and 6,576 jobs would have been lost, all within the region served by Turlock and Modesto irrigation districts.

The SED also threatens our ability to sustainably manage groundwater. The Modesto and Turlock subbasins are the only two basins in the San Joaquin Valley that aren’t listed in conditions of critical overdraft. With the SED’s significantly increased unimpaired flows, our customers will have to rely more heavily on groundwater – this is counter to the goals of the Sustainable Groundwater Management Act.

Recommendation

It is recommended that the Board of Directors adopt the resolution opposing the State Water Resources Control Board’s (SWRCB) Phase 1 Revised Draft Substitute Environmental Document and requesting the SWRCB pursue a comprehensive solution.

Presenter Signature/Date:	Dept. Manager Signature/Date:	Assistant GM Signature/Date:	General Manager Signature/Date:
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RESOLUTION NO. 2016 – 69

Resolution Outlining the Turlock Irrigation District’s Opposition to the State Water Resources Control Board’s (SWRCB) Phase 1 Revised Draft Substitute Environmental Document and Requesting the SWRCB Pursue a Comprehensive Solution That Prioritizes Non-Flow Measures to Protect Native Fish Species Before Requiring Flow Increases That Would Threaten the Economic Vitality of our Region

Whereas, the State Water Resources Control Board’s Bay-Delta Plan, Phase 1 Draft Substitute Environmental Document (SED) issued in December 2012 proposed to require the Stanislaus, Tuolumne, and Merced rivers release 35 percent of unimpaired flows from February to June each year for environmental benefit; and

Whereas, the State Water Resources Control Board, after a two-day hearing in March 2013 regarding the adequacy of the SED, decided to revise the analyses and recommendations provided in the Draft SED, with the ultimate intent of bringing a final SED to its Board for adoption at a date to be determined; and

Whereas, a revised Draft SED was issued on September 15, 2016 and is currently being circulated for public comment. The revised draft proposes to require the Merced, Stanislaus and Tuolumne rivers release 40 percent unimpaired flows from February to June each year for potential environmental benefit; and

Whereas, flows described in the SED will create “significant and unavoidable” lasting impacts that will harm the socioeconomic welfare of those within Stanislaus, San Joaquin and Merced counties; and

Whereas, water supply impacts of flows described in the SED include the loss of hundreds of thousands of acre-feet of surface water that is used to keep agriculture—the region’s economic engine—stable. This loss of water would result in the fallowing of some of the most prime farmland in California; and

Whereas, if the SED’s unimpaired flows were in effect in 2015, in addition to already-incurred impacts from the fourth year of a drought, the economic impacts of the SED would have included \$1.6 billion in economic output loss, \$167 million farm-gate revenue loss, \$330 million in labor income loss, and 6,576 jobs would have been lost, all within the region served by Modesto and Turlock irrigation districts; and

Whereas, groundwater impacts of flows described in the SED include increased groundwater pumping at a time when California is working to implement the landmark Sustainable Groundwater Management Act. Impacts from flow increases described in the SED include a severely hampered ability to conjunctively use surface water on farms to provide adequate groundwater recharge; and

Whereas, power impacts of flows described in the SED include TID being resigned to generating more hydropower at a time of low demand, meaning less water is available to generate hydropower in summer when power demand is at its peak; and

Whereas, there is reasonable and significant doubt that the flows described in the SED will benefit native fish populations or promote ecosystem restoration. The SED focuses narrowly on flows as a solution to environmental concerns while ignoring non-flow alternatives such as predator suppression and fish habitat restoration. Such non-flow management measures are often less costly and more effective; and

Whereas, in 2015 TID entered into a historic agreement with the Stanislaus Regional Water Authority to transfer surface water for domestic use to diversify their drinking water sources. With the implementation of the SED, the use of surface water for drinking water is threatened and will leave municipalities and disadvantaged communities even more vulnerable to the impacts of drought.

BE IT THEREFORE RESOLVED, by the Board of Directors of the Turlock Irrigation District to oppose the State Water Resources Control Board's (SWRCB) Phase 1 Revised Draft Substitute Environmental Document and requesting the SWRCB pursue a comprehensive solution takes into account, rather than dismisses, the impacts listed above. This solution must prioritize non-flow measures to protect native fish species before requiring flow increases that would threaten the economic vitality of our region.

Moved by Director Macedo, seconded by Director Fernandes, that the foregoing resolution be adopted.

Upon roll call the following vote was had:

Ayes:	Directors Fernandes, Santos, Macedo and Alamo
Noes:	None
Absent:	Director Frantz

The President declared the resolution adopted.

I, Dorinda Soiseth, Deputy Secretary to the Board of Directors of the TURLOCK IRRIGATION DISTRICT, do hereby CERTIFY that the foregoing is a full, true and correct copy of a resolution duly adopted at a regular meeting of the Board of Directors held the 4th day of October, 2016.

Deputy Secretary to the Board of
Directors of the Turlock Irrigation District