



Don J. Cameron
Board President
General Manager,
Terranova Ranch, Inc.

Joshua Eddy
Executive Director

Rachelle Pastor Arizmendi
Government Industry
Advisor, Avenu Insights &
Analytics

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Chief of Staff, Driscoll's

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Joseph Gallo Farms

Eric Holst, Senior Director,
Environmental Defense
Fund

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and Natural Resources,
University of California

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Grounded

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Lundberg Family Farms

David Mancera, Director,
Mancera Consulting
Group

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The Nature Conservancy

Doria Robinson,
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Vencer Public Affairs and
Strategy

Joy Sterling, CEO
Iron Horse Vineyards

Patricia Stock, Dean
College of Agriculture,
California State University
Chico

Christopher Valadez,
President, Grower Shipper
Association of Central
California

December 20, 2023

State Water Resources Control Board
Division of Water Rights
Attn: Bay Delta & Hearings Branch
P.O. Box 100
Sacramento, CA 95812-2000

RE: Comment Letter – Sacramento/Delta Draft Staff Report

Dear Chair Esquivel and Members of the Board:

The California State Board of Food and Agriculture (Board) appreciates and understands the need for updates to the Water Quality Control Plan for the San Francisco Bay/Sacramento San Joaquin Delta Estuary (Bay Delta Plan) for the reasonable protection of fish and wildlife. The most recent Sacramento/Delta Draft Staff Report, reiterates several stand-alone alternatives that are based on flow scenarios provided in the SWRCB's 2018 Framework. The proposed change to the Bay Delta Plan from the Delta Draft Staff Report focuses on the proposed inflow objective - *"Maintain inflows from the Sacramento/Delta tributaries at 55% unimpaired flow, within an allowed adaptive range between 45 and 65% unimpaired flow."* The proposed changes to the Bay Delta Plan would have significant impact on California's farmers, ranchers and farmworkers as well as the communities in which they are based.

California's agriculture is unique and diverse - supporting the nation's food security, addressing climate challenges, and advancing consumer priorities in animal welfare, soil health and farm-to-school. Economic impacts, as estimated in the Delta Draft Staff Report, include loss of acreage, closing of processing plants, substitution of crops, and decline in crop supply. Overall economic effects from the SWAP-Modeled Change in Agricultural Production show a \$996M impact on agricultural output, \$534M loss of income and an estimated loss of 8,480 jobs under the 55 percent flow scenario.

When these economic impacts are combined with a similar analysis for the implementation of the Sustainable Groundwater Management Act, the future landscape of the Central Valley will be much different than today.



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An alternative to consider is found within California's Water Resilience Portfolio. The Portfolio contains a key strategy to address the state's water challenges - Protect and Enhance Natural Ecosystems. One of the recommended actions (9.3) within the Portfolio is "Bring together regulators, tribes, water users, public water agencies, nongovernmental organizations, and other stakeholders to develop innovative, voluntary solutions to water supply, water quality and ecosystem protection." This recommended action is critical to help advance on-ground solutions to California's diverse water challenges. It is also preferred path forward for updating the Bay-Delta Plan as the Proposed Voluntary Agreement Alternative (Alternative 6).

The Board greatly appreciates the Governor's leadership in advancing the Agreements to Support Healthy Rivers and Landscapes and we continue to strongly support the ongoing efforts of the Administration and federal partners to implement these agreements. The progress that has been made through the voluntary agreement framework will greatly benefit the Bay-Delta and provide reasonable protection for fish and wildlife.

It is with this consideration that the Board recommends that Alternate 6, Proposed Voluntary Agreement Alternative, be strongly evaluated as the proposed change to the Bay-Delta Plan for the Sacramento/Delta.

Sincerely


Don Cameron

cc: Governor Gavin Newsom
Secretary Karen Ross, California Department of Food and Agriculture
Secretary Yana Garcia, California Environmental Protection Agency
Secretary Wade Crowfoot, California Natural Resources Agency
Director Karla Nemeth, California Department of Water Resources
Director Chuck Bonham, California Department of Fish and Wildlife