

**WATER BOARD SAN JOAQUIN RIVER ‘UNIMPAIRED FLOW’
REVISED FACT SHEET AND KEY MESSAGES
Prepared by the California Farm Bureau Federation, July 24, 2018**

Regulatory Context

- The flow proposal is an update of the Bay-Delta Water Quality Control Plan under California’s Porter-Cologne Act.
- It seeks 30 to 50 percent of “unimpaired flows,” starting with a “mid-point” of 40 percent, in the Tuolumne, Merced and Stanislaus rivers, for the stated purpose of benefiting protected fish.
- As of July 2018, a Water Board ‘Framework’ document proposes similar unimpaired flows standards of 45 to 65 percent, starting with a “mid-point” of 55 percent, for the Sacramento River watershed.
- Additional information is available from the California Farm Bureau Federation under ‘Unimpaired Flow Standards’ [here](#).

WATER SUPPLY AND ECONOMIC IMPACTS

Water Supply Impacts

- SURFACE WATER: Diverters in the Stanislaus, Tuolumne and Merced river watersheds would lose averages **179,500 acre-feet/year** at a 30 percent unimpaired flow, **293,000 acre-feet/year** at 40 percent, and **491,000 acre-feet/year** at 50 percent; in the driest years, these losses increase to maximums of **456,000 acre-feet/year**, **732,000 acre-feet/year**, and **902,000 acre-feet/year**, respectively.¹
- RESERVOIR CAPACITY: The plan would impose end-of-September “minimum cold pool” requirements (i.e., water that must be left in the reservoir) of **700,000 acre-feet** in New Melones, **800,000 acre-feet** in Don Pedro, and **300,000 acre-feet** in New Exchequer—representing a combined increase of some **800,000 acre-feet** over current minimum end-of-year carry-over requirements in the three reservoirs (i.e., the volume of water required to be left in-reservoir through the summer and, therefore, unavailable for any other purpose).²
- GROUNDWATER IMPACT: Flow requirements in the range of 30 to 50 percent would increase groundwater pumping and/or decrease recharge by an annual average of **118,000 acre-feet/year** at a 30 percent unimpaired flow, **232,370 acre-feet** at 40 percent, and **371,720 acre-feet/year** at 50 percent.³

Economic Impacts

- At a 50-percent water supply loss, the Turlock and Modesto irrigation districts estimate annual impacts at **\$920 million** in total economic output, **\$237.5 million** in labor income and **5,387 full and part-time jobs**. The impacts would come from lost crop production and reduced food and beverage processing.⁴
- Regional economic impacts under the board’s unimpaired flow proposal in the Merced River watershed range between **\$751 million/year** and **\$1.3 billion/year** in below average, dry and critical water years, according to estimates from the Merced Irrigation District.⁵
- In the South San Joaquin and Oakdale irrigation district service areas on the Stanislaus River, permanent average annual regional economic losses are estimated at **\$250 million**.⁶

KEY MESSAGES

Harmful

Farm families and rural communities will suffer as a result of this proposal.

- It would reduce availability of surface water for people and crops.
- It would limit opportunities to improve groundwater supplies as required by the Sustainable Groundwater Management Act.
- It would reduce agricultural production, which would harm everyone who depends on that production.
- It represents a threat to the integrity of California’s water rights system.

Flows-Only vs. Functional Flows

- We should focus efforts on the idea of functional flows—targeting just the right amount of water at the right times.
- In addition, the state must look at all of the stresses affecting fish—habitat, predation, fish passage, hatchery management, etc.—not just streamflows.
- From many years of experience, we have learned that simply requiring more water doesn't really help the fish.
- Reducing water storage in wet years would, in fact, make conditions worse by creating perpetual shortages for all purposes.
- By worsening ecological conditions, the resulting perpetual shortages would also make it more difficult to move water across the delta and to permit and operate new storage and conveyance projects elsewhere in the state.

Conflict vs. Collaboration

- For conservation to be effective, local communities need to be part of the solution—not a target of regulation.
- This project would increase conflict and stop or impede voluntary collaboration to achieve real conservation benefits.

Unreasonable in Light of Workable Solutions

- The proposal would unreasonably require fixed percentages of flows when other, more effective options are available.
- It would impose a very high cost on rural communities, farmers and other people, while providing little or no benefit to fish.

SGMA Implications, One-Two Punch

- The Sustainable Groundwater Management Act requires local communities to make tough decisions to bring their groundwater basins into compliance.
- This proposal would take away surface supplies currently used for irrigation.
- Additionally, it would limit the ability of local communities to rely on winter flows to recharge groundwater basins.
- In these watersheds, this means reliable surface water and sustainable groundwater would be replaced by inadequate surface water and a likely increased reliance on groundwater in times of shortage.
- State law requires rural communities to solve this SGMA challenge, but the board proposal would make the problem worse, while limiting key tools necessary to solve the problem.

¹ Based on information drawn from Final Draft SED, Chapter 5, p. 5-77, Table 5-20b (“Annual Cumulative Distributions of Percentage of Demand for Diversion Met for Baseline and LSJR Alternatives 2, 3, and 4 (20, 40, and 60 Percent Unimpaired Flow) for Irrigation Years 1922-2003”). (See Farm Bureau’s changes in baseline diversions based on the Water Board’s surface water impact Table 5-20b at <http://www.cfbf.com/top-issues#water> under “Unimpaired flow standards (San Joaquin and Sacramento Rivers),” “San Joaquin Tributaries Surface Water Info.”)

² See Final Draft SED, Appendix F.1, pp. F.1-36 through F.1.-38.

³ Based on information drawn from Final Draft SED at 9-57, Table 9-12 (“Average Annual Net Change in Irrigation District Groundwater Balance with the LSJR Alternative per Subbasin Area”). (See Farm Bureau’s acre-foot conversions of the Water Board’s groundwater impact Table 9-12 at <http://www.cfbf.com/top-issues#water> under “Unimpaired flow standards (San Joaquin and Sacramento Rivers),” “San Joaquin Tributaries Groundwater Info.”)

⁴ See Turlock ID’s and Modesto ID’s April 2014 “Socioeconomics Study Report” for the Don Pedro Project (FERC License No. 2299) at 8-8 and 8-9, Table 8.3-1 (“Annual regional economic impacts from water supply shortages – crop production”) and Table 8.3-2 (“Annual regional economic impacts from water supply shortages – regional food & beverage processing dependent crop production in the District’s water service area”).

⁵ See Economic Impacts of Reduced Water Availability to Merced Irrigation District, p. 5-12, Table 5-7 (“Regional Economic Impacts of the SWRCB’s Plan by Water-Year Type: Output, Jobs and Labor Income”).

⁶ See also *Manteca Bulletin*, December 6, 2016, “600 fish will cost 209 region \$250 million.”