



July 8, 2015

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

Dear Chairwoman Marcus:

Stanislaus County has a population of over 525,000 residents; a large percentage of which are served by groundwater as the source of drinking water. As the Director of Environmental Resources for the County, I am responsible for the administration and oversight of over 200 public water systems, approximately 2,000 retail food facilities, and countless other businesses. In addition, Stanislaus County's leading industry is agriculture, and as such, is at the epicenter of the groundwater crisis. Because of this, the drought has a greater economic impact here since this is the industry most sensitive to water shortages.

In 2012, the State Water Resources Control Board (SWRCB) released to the public a suggested range for increasing the unimpaired flows of the Merced, Tuolumne, and Stanislaus Rivers. This report went to extensive lengths to discuss impacts to groundwater and concluded that the impacts to the groundwater basin were "significant, but unavoidable." This would be devastating to the local economy and the residents of Stanislaus County who live and work here.

The report's groundwater pumping provisions include unrealistic assumptions. The assumptions state that any increase in groundwater pumping resulting from municipal or industrial use would be accounted for by the additional diversions of surface water away from irrigation. This essentially means that there could be no net increase in groundwater use unless there is a reduction in surface water irrigation use. Given that the report does not address the drought-fueled groundwater pumping increases, the devastation this recommendation will cause may be significantly understated.

The environmental review process is intended to address such issues and identify mitigation measures, yet my colleagues in Merced County and I have not had the opportunity to discuss these very real problems with the SWRCB. Given this, please be advised that we will be requesting that a meeting be held with your staff, together with our local jurisdictions, to compare information and discuss strategies to offset the impacts of your recommendations. Many of our communities already have well production problems and drinking water quality issues. If we are to reach groundwater sustainability as is now required by enacted California legislation, we must look at these issues comprehensively.

In our roles as County officials, we are required to ensure that safe, adequate and dependable water supplies are available for domestic use. We cannot perform that function if the SWRCB does not engage us. We look forward to your response. For additional information, I can be contacted at (209) 525-6770.

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Sincerely,



Jami Aggers  
Director of Environmental Resources  
Stanislaus County

Cc: Stan Risen, Chief Executive Officer  
Keith D. Boggs, Assistant Chief Executive Officer  
William O'Brien, Supervisor District 1  
Vito Chiesa, Supervisor District 2  
Terry Withrow, Chairman, Supervisor District 3  
Dick Monteith, Supervisor District 4  
Jim DeMartini, Supervisor District 5  
Walt Ward, Water Manager  
Vicki Jones, Interim Director of Environmental Health, Merced County