



March 25, 2013

13401 E. Jefferson St.
Le Grand, CA 95333

State Water Resources Control Board
Jeanine Townsend
Clerk of the Board
P.O. Box 100
Sacramento, CA 95814-0100

RE: Comment Letter – Bay/Delta Plan SED

Board Members:

My name is Donna Giampaoli Vaughan and I am writing this letter to voice my strong opposition to your draft SED for the Bay-Delta Plan, and to request you revise the SED so that non-flow alternatives are prioritized. These other alternatives, like predation programs, will provide greater benefits and protections for fish, and should be put in place before demanding more flow from rural areas like mine that are already in economic distress.

If approved, the proposal in you Bay-Delta SED to require the Merced, Tuolumne and Stanislaus rivers to dedicate 35 percent of unimpaired flow to fish and wildlife will devastate San Joaquin, Stanislaus and Merced Counties in a number of ways. Our region is struggling economically and faces significant challenges with poverty, unemployment and foreclosures. We cannot afford to fallow our land, lose hundreds of jobs and lose tens and sometimes hundreds of millions of dollars annually from agricultural income which supports this region.

Your proposal will result in the over-drafting of the groundwater basins in this area, which are already strained and dropping every year. The people that live in the cities of Merced, Atwater and Livingston rely exclusively on groundwater as there source of drinking water and the farmers rely on the groundwater to irrigate our family farms.

Your proposal will also devastate the hydropower production in our region by taking water from reservoirs during the spring, leaving less water available in the summertime when it is critically needed to relieve strain on the state's power grid.

Most importantly, however, this ill-conceived plan is based on an assumption that is will help restore the Delta's native fisheries. This assumption is not supported by science or evidence. Rather, the proposal presents unilateral demands without quantifying the benefit or goal to be achieved. Before imposing a plan that carries such serious consequences, the Board must first implement non-flow measures. Given

the scarcity of water in California, non-flow measures such as predator suppressions must be put in place before the State Water Board puts local family farms out of business.

I strongly urge the Board to reject this proposal.

Sincerely,



Donna Giampaoli
Partner and Salesperson
Live Oak Farms, L.P.

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