

March 21, 2014

Mr. Tom Howard, Executive Director  
State Water Resources Control Board  
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Sacramento, CA 95814

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American Federation of  
Teachers, AFL-CIO

Dear Mr. Howard:

We urge you to defer issuing the State Water Resources Control Board's extraordinarily far-reaching proposed order prioritizing water deliveries throughout the State until at least March 21 to make sure it is correctly calibrated to minimize the potentially devastating effects on many Californians. We appreciate the efforts of coordination that are underway between federal, state, and local stakeholders, and are encouraged by the outreach on the proposal. Nevertheless, we believe that additional time is needed to allow all affected parties ample opportunity to fully understand your proposal, and to work with your staff to develop alternatives that account for the recent rainfall, maintain fully defined public health and safety goals, and avoid catastrophic reductions of water deliveries to California agriculture.

It is our understanding that the State Water Resources Control Board ("the Board") plans to issue a decision soon that could cut back all Delta water pumping for agriculture and refuges, except possibly during periods of high outflow, in order to achieve enough carryover storage at the end of this September to protect public health and safety should extreme dry hydrology continue into 2015.

We are aware that the Board faces difficult decisions in balancing all beneficial uses of water. However, we are very concerned that if the current proposal as reported to us is enacted, it will have significant near- and long-term effects on the California economy and, more importantly, will not achieve the desired water supply security intended by the proposal.

As our focus is education, these economic effects would compound the educational viability of the students in the affected areas, primarily the Central Valley. Already high unemployment exists and many of our students in that area move schools based upon the agricultural employment opportunities for their parents. The effect of this recommendation would destabilize these students, as well as the entire communities throughout the affected areas.

We hope that federal, state, and local entities working together can develop options that would be respectful of the Board's goals, but also allow flexibility in fulfilling water contracts and mitigating the effects of a severe cutback in water deliveries. Providing more time would also allow stakeholders to assess the effects of the current rainstorms, and provide the Board with the best available information on which to base complex water delivery decisions that could affect large parts of California, especially those regions that are integral to our nation's agricultural economy.

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Federal and local stakeholders have informed us that there may be ways to maintain the advance notice that the Board desires, but still leave enough time to fully consider relevant data and options before issuing a decision.

The Board's final decision could have far-reaching effects. The potential of stopping all pumping out of the Delta for agriculture and refuges, except when there are high runoff flows, is of deep concern to water contractors both north and south of the Delta who have been hit by one piece of bad news after another.

These are the same contractors who have received, for the first time ever, an initial allocation of zero from the State Water Project. Many of them also received an initial allocation of zero from the Central Valley Project. Even those who have senior water rights, and who have never received less than 75 percent of their allocations, are unlikely to receive greater than 40 percent of water deliveries this year.

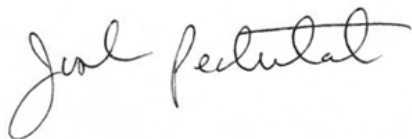
The Board's current proposal could reduce allocations further. For example, the Exchange Contractors estimate that the proposal would leave them with the equivalent of a 10 percent allocation, down from 40 percent, and without any option to make up the difference even with significant groundwater overdrafting.

This final order must be formulated with great care so that its burdens do not unduly fall on those who have already had to give up a great deal. We are deeply troubled by the difficulties that face California agriculture, and do not wish to see the situation worsen.

Again, we sincerely appreciate the dialogue and collaboration you have planned for the coming weeks with various stakeholders. We reiterate our hope that you will defer your decision, so there will be ample time to assess all viable alternatives before the Board issues a final decision. We, also, want to reiterate the broad effects this will have on the communities and the education system throughout this part of California, and great caution and careful consideration should be taken before an extreme decision is made.

Thank you for your urgent attention to this very important matter.

In Unity,



Joshua Pechthalt

President

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cc: The Honorable Edmund G. Brown, Jr., Governor, State of California  
Karen Ross, Secretary, California Department of Food and Agriculture  
Janelle Beland, Undersecretary, California Natural Resources Agency  
Gordon Burns, Undersecretary, California Environmental Protection Agency  
Felicia Marcus, Chair, State Water Resources Control Board  
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