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Executive Director

Michael Wade

TO: San Luis & Delta-Mendota Water Authority Board of Directors

FROM: Mike Wade, Executive Director

DATE: August 4, 2025

RE: Program and Activities Update

Bay-Delta Plan Update

CFWC recently published and distributed a blog titled, ***“Will the Bay-Delta Plan Succeed? It Has a Good Chance if the Healthy Rivers and Landscapes Alternative Is Allowed to Work.”*** The blog outlines the benefits of the Healthy Rivers and Landscapes (HRL) approach as the most viable path forward for the Bay-Delta. On July 24, 2025, the State Water Resources Control Board released its long-awaited draft update to the Bay-Delta Water Quality Control Plan—its first major revision in nearly three decades. The update presents two implementation options: a regulatory-only Unimpaired Flow Alternative and the HRL approach, which combines targeted flow improvements with habitat restoration and scientific monitoring. The Coalition argues that HRL is more likely to produce lasting ecological benefits while avoiding the severe water supply impacts associated with a rigid flow-only regime. Backed by ~\$2.9 billion in funding over the next eight years, the HRL program includes an adaptive management framework that evaluates progress every three years and allows for adjustments as needed. The post emphasizes that success depends on whether the HRL alternative is given the opportunity to operate as designed, noting its collaborative development and broad stakeholder support.

Read it here: <https://farmwater.org/farm-water-news/will-the-bay-delta-plan-succeed-it-has-a-good-chance-if-the-healthy-rivers-and-landscapes-alternative-is-allowed-to-work/>

Joint Opinion Piece

In an op-ed titled, ***“Want Food Security? Keep Water on Western Farms,”*** CFWC partnered with Dan Keppen of the Family Farm Alliance to argue in the Palm Springs Desert Sun that maintaining reliable water supplies for Western agriculture is essential to national food security, economic stability, and global environmental responsibility. While urban areas have made significant strides in water efficiency—such as Los Angeles reducing water use by 28% since 1986—farmers have also increased productivity through innovation, growing more food with less water. Agriculture continues to face growing criticism over its share of water use, particularly in the Colorado River Basin. We warned that the real threat isn’t agricultural water use, but the accelerating loss of domestic farmland due to water shortages and urban sprawl. California could lose up to one million acres of farmland, and similar trends are unfolding in Arizona and Southern California. As farmland disappears, food production shifts overseas, where labor and environmental standards are often weaker. This shift increases U.S. dependence on foreign food supplies and poses serious risks from trade disruptions, political instability, or drought. When the U.S. loses farmland, it doesn’t reduce global food demand—it pushes that demand to countries that may clear rainforests and contribute more to climate change. Protecting domestic farmland with a stable water supply helps ensure food production grown to California’s high standards, maintains consumer access to affordable groceries, and reduces global environmental harm. The article concluded with a

clear message: if the U.S. wants to avoid food shortages, protect the environment, and maintain sovereignty over food standards, it must prioritize water for Western farms.

Read it here: <https://www.desertsun.com/story/opinion/columnists/conversations/2025/08/01/colorado-river-keep-water-on-california-farms/85425484007/>

Sites Reservoir

CFWC submitted a letter to **The Independent** newspaper (Livermore and Tri-Valley area) in response to the paper's editorial on the Sites Reservoir project, challenging its portrayal of California farmers as wasteful and marginal to the state's economy. https://www.independentnews.com/editorials/water-project-is-running-roughshod-over-environmental-concerns/article_70728776-e8ff-42ae-a88c-f150ff9f8c44.html

CFWC's letter defended the need for Sites Reservoir, emphasizing its design to capture water during flood and wet years and store it in an off-stream basin to minimize environmental impacts. It highlighted decades of innovation in agricultural water use efficiency, citing DWR statistics pointing to an 86.5% increase in economic efficiency with a 15% reduction in water use. The letter warned against undervaluing crops like alfalfa, pistachios, and almonds, which play a critical role in the food chain including support for the production of widely consumed dairy and protein products. The letter also stressed the urgency of preserving farmland, noting that California could lose up to 900,000 acres without reliable water supplies. As domestic farmland declines, food production is shifting overseas, increasing U.S. dependence on imported produce and exposing consumers to supply chain risks. Sites Reservoir is a timely and necessary project that benefits not only local communities like the Tri-Valley area but also helps secure California's food supply and broader agricultural economy.

As of 8-4-25, no publication date of CFWC's response has been announced.

Will the Bay-Delta Plan Succeed? It Has a Good Chance if the Healthy Rivers and Landscapes Alternative is Allowed to Work

On July 24, 2025, the State Water Resources Control Board released an updated Bay-Delta Water Plan, a critical framework designed to protect the ecological health of the Sacramento-San Joaquin Delta while addressing California's diverse water demands. The plan outlines two primary approaches—the Unimpaired Flow Alternative and the Healthy Rivers and Landscapes (or Voluntary Agreements) alternative, to balance water quality, ecosystem restoration, and water supply needs. So, what are the key differences between these approaches? How is their success evaluated? And what is the unimpaired flow alternative water users may have to adopt?

A dive into the Plan helps answer those questions, and more.

Key Differences Between Approaches

The Bay-Delta Water Plan presents two distinct strategies for managing water quality and ecosystem health in the Delta. The Unimpaired Flow Alternative focuses on maintaining a specific percentage of natural river flows, typically set at 55% but adjustable between 45% and 65% depending on water year types (e.g., wet or dry conditions). This approach prioritizes flow as the primary mechanism to support water quality and habitats for native species, such as salmonids and Delta smelt. In contrast, the HRL program integrates water flow with non-flow measures, such as restoring spawning grounds, rearing habitats, and floodplains. This pathway provides greater flexibility, allowing water users to adjust flow releases and construct habitat projects to meet specific needs according to local conditions. The unimpaired flow alternative relies on regulatory enforcement through water right curtailments whereas Healthy Rivers and Landscapes emphasizes collaborative agreements and adaptive management, enabling water users to adjust strategies based on real-time ecological data and adaptive management.

Measuring Success

The plan outlines distinct criteria for evaluating the success of each approach. For the unimpaired flow alternative, success hinges on maintaining the required instream flow and achieving biological goals, which has been the way much of the system has been managed for several decades while fish populations continue to decline. The goal of increasing the “abundance, productivity, genetic diversity, and spatial distribution of native fish populations” seems unattainable without a new, more comprehensive restoration effort.

Regular monitoring and annual reports track compliance and ecological outcomes, which would be demonstrated by increased fish populations and improved water quality, including meeting salmon doubling objectives. For the HRL program, success is measured by fulfilling flow commitments above baseline conditions, completing habitat restoration

projects within its planned eight-year term, and evaluating success on the quality of improved habitat and the benefits it provides species that depend on the system. Regular reporting on flow and habitat benefits will demonstrate whether or not the Healthy Rivers and Landscapes alternative will be successful. I believe it will because fish need more than just more water to thrive, they need a healthy place to live and that's what HRL is all about.

Compliance with Unimpaired Flow Rules

The Water Quality Control Plan specifies when water users must comply with unimpaired flow rules. Water users on certain tributaries, such as the Stanislaus, Tuolumne, Merced, and other Sacramento/Delta tributaries, are subject to these rules if they are not part of an approved HRL plan. If a water user under this alternative fails to meet flow, habitat, or monitoring commitments, the State Water Board may terminate their participation in the alternative HRL plan, requiring compliance with unimpaired flow rules. The Board may also enforce these rules if water users fail to protect beneficial uses, jeopardize native fish survival, or if they violate water quality or temperature objectives.

During water scarcity, junior water rights holders may face curtailments to meet flow objectives. Additionally, according to the Bay-Delta Plan, applicants for new water rights or changes to existing rights may need to adhere to unimpaired flow rules as a condition of approval. These rules automatically apply to specified tributaries unless a water user is in an approved HRL Landscapes plan or qualifies for an exception, such as minimal diversions.

The Bay-Delta Water Plan's dual approaches offer distinct paths to address the Delta's ecological challenges. The unimpaired flow alternative continues to lean on the failed, flow-centric strategy that has led to the near total demise of the Delta smelt and lackluster salmon recovery. On the other hand, Healthy Rivers and Landscapes creates collaboration and flexibility, combining flows with habitat restoration and a better chance at succeeding in species recovery.

Both approaches rely on robust monitoring and adaptive management, but their quantifying success differs, with unimpaired flows focusing on flow compliance and biological outcomes, and HRL emphasizing integrated ecosystem recovery.

The State Water Board retains its authority to enforce unimpaired flow rules to ensure compliance with Bay-Delta Plan objectives, particularly if the HRL alternative falls short, which is unlikely, based on the success of similar efforts already underway throughout the Sacramento River and San Joaquin River watersheds.

Comment on the Draft Plan

The public comment period is open until September 10, 2025. The water user community and the public have a critical opportunity to provide input, shaping the plan's implementation to safeguard the Delta's ecosystem while meeting California's water needs, hopefully through the implementation of sensible, science-driven projects.

To read or comment on the Bay-Delta Plan, visit:

https://www.waterboards.ca.gov/waterrights/water_issues/programs/bay_delta/bay_delta_plan/docs/notice-baydeltaplanupdates-07-2025-en.pdf

Want Food Security? Keep Water on Western Farms

By Mike Wade and Dan Keppen

In the distant past, hunters and gatherers relied on what nature provided. Today, farmers grow food for billions of people around the globe—and that takes water.

Yet there's a growing drumbeat about the amount of water agriculture consumes in the Colorado River Basin and beyond. Critics say farmers use a disproportionate share compared to cities and if farmers would simply use less, there would be plenty for everyone else.

There's no question every water user must pursue efficiency, and urban areas have made impressive gains. Los Angeles cut total water use by 28% between 1986 and 2023, even as its population grew by 16.5%.

Farmers, too, have been innovating for decades. In California, crop value increased 86.5% over four decades while water use dropped by nearly 15%, according to the Department of Water Resources. Farmers have embraced technology to do more with less.

But the conversation can't end there. Farmland across the West is vanishing—lost due to water shortages and swallowed up by urban sprawl. California could lose up to 1 million acres of farmland, according to the Public Policy Institute of California. Arizona and Southern California are quickly losing farmland to urbanization, with Maricopa County leading the nation in farmland loss, according to the American Farmland Trust.

So where will our food come from?

As domestic farmland disappears, farms shift overseas, where environmental and labor standards often lag behind our own. Since 1980, U.S. fruit imports from Mexico more than doubled; vegetable imports quadrupled, USDA data show. As of 2023, the United States now imports more than half its fresh fruit and nearly one-third of its vegetables—a dependency that grows every year.

It's risky. If you're uneasy about relying on foreign energy or manufacturing, imagine more dependency on foreign food. Drought, politics, or trade disruptions could leave supermarket shelves bare.

There's also the global climate to consider. In his book *We Are Eating the Earth*, author Michael Grunwald warns the greatest threat to the planet isn't the water used on farms here—it's the clearing of rainforests to feed a growing population. When we pave over farmland in the U.S., we don't eliminate demand for food. We push demands overseas, accelerating deforestation and compounding climate impacts.

Grunwald puts it bluntly:

“We’ll need to expand agricultural production about 50 percent by 2050 to feed our hot and hungry planet...while shrinking our agricultural footprint.”

If we fail to prioritize domestic food production, we don’t just risk shortages or higher prices. We lose the ability to set the standards for how our food is grown and how farmworkers are treated. And we amplify global environmental harm instead of reducing it.

The water farmers use doesn’t stay on the farm—it returns in the food we buy at the grocery store. That food feeds not just millions of people in the Southwest but tens of millions more across the country.

Urban conservation is critical. So is ensuring that farms have the water they need to grow food for the rest of us. Failing to prioritize food production is a recipe for disaster.

If we want healthy, affordable food without risking supply chain shocks and global environmental damage, we must make sure that Western farms have what they need most: water.

Our national security depends on it—and so does the planet.

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Mike Wade is the executive director of the California Farm Water Coalition, a non-profit organization dedicated to educating the public about the need for reliable water supplies on California farms and the efficient practices farmers use to grow our food.

Dan Keppen is the executive director of the Family Farm Alliance, a nonprofit organization advocating for family farmers, ranchers, and irrigators in the Western U.S.

Water Project is Running Roughshod Over Environmental Concerns

Livermore Independent

7-31-25

Your editorial, “Water Project is Running Roughshod Over Environmental Concerns” (7-31-25) accurately portrayed California’s need for new water infrastructure, including the proposed Northern California Sites Reservoir, and admitted that the Tri-Valley area served by your publication will benefit. What was inaccurate was its portrayal of farmers as wasteful and unimportant to the economy.

Sites Reservoir is unique because it will operate by diverting flood and wet-year water into an off-stream basin, a strategy specifically designed to prevent negative environmental impacts.

Decades of on-farm innovation means their economic efficiency increased 86.5% over four decades while water use dropped by nearly 15%, according to the Department of Water Resources. Farmers have embraced technology to do more with less.

Picking winners and losers among the 400 commodities grown by California farmers is a mistake that will disrupt our food supply. Alfalfa is a foundational crop in the food chain, bringing us milk, cheese, yogurt, ice cream, pizza, hamburgers, and more, which are valuable sources of protein that consumers want.

The sad fact is that western farmland is disappearing. California alone could lose up to 900,000 acres, according to the Public Policy Institute of California. Why? Without adequate water allocation, food won’t grow.

So where will our food come from?

As our farmland disappears, food production shifts to other countries where environmental and labor standards often lag behind ours . Since 1980, U.S. fruit imports from Mexico more than doubled; vegetable imports quadrupled, according to the USDA. As of 2023, the United States now imports more than half its fresh fruit and nearly one-third of its vegetables—a dependency that grows every year.

If you’re uneasy relying on foreign energy or manufacturing, what about food? In this time of international turmoil do we really want to rely on foreign countries for the food we feed our families?

The water farmers use doesn’t stay on the farm—it returns in the food we buy at the store. That food feeds not just millions of people in California, but tens of millions more across the country.

If we want healthy, affordable food without risking supply chain shocks, we must make sure California farms have the water they need.

Sites Reservoir is a project that will benefit people throughout California, including the Tri-Valley area citizens and the farms, vineyards, and wineries surrounding Livermore. It's the right project at the right time for all of us.