



## CALIFORNIA POULTRY FEDERATION

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April 1, 2016

Mark W. Cowin, Director  
Department of Water Resources  
1416 - 9th Street, Room 1115-1  
Sacramento, CA 95814

Dear Mr. Cowin:

The California Poultry Federation (CPF) is pleased to offer these comments on the Department of Water Resources' Draft Emergency Regulations for Groundwater Sustainability Plans and Alternatives.

The CPF is the state's only trade association for chicken and turkeys, representing all segments of the industry including growers, hatchers, breeders and processors. The CPF represents the chicken and turkey production and marketing companies in California. We are also the representatives for the California Squab Producers, the largest squab processing facility in the world, and represent ducks, layers, game birds and other meat poultry as well.

It almost goes without saying that "California wouldn't be the economic powerhouse it is today without groundwater." Water Education Foundation, *The 2014 Sustainable Groundwater Management Act: A Handbook to Understanding and Implementing the Law* (2015). In particular, groundwater "has helped fuel the state's agricultural industry"—including poultry growers, hatchers, breeders and processors—as well as "establish the development of cities and industries." *See id.*

The Sustainable Groundwater Management Act itself recognizes the importance of all beneficial uses of groundwater, including agriculture. *See* Cal. Water Code (CWC) § 10723.2. Thus, the Act declares the policy of the state to be that "groundwater resources be managed sustainably for long-term reliability and multiple economic, social, and environmental benefits for current and future beneficial uses." *Id.* § 113.

Accordingly, the draft emergency regulations incorporate several provisions addressing all beneficial uses. For example, "water supply reliability" is appropriately defined as "satisfy[ing] reasonable demands for the beneficial uses and users of water." Draft Cal. Code Regs. Tit. 23 (dCCR), § 351(ag). Beyond that, sustainability plans must describe any quality issues "that may impact the supply and beneficial uses of groundwater," while sustainability agencies must include effects on beneficial users in their "undesirable effects" and describe how minimum thresholds will affect beneficial uses of groundwater. dCCR §§ 354.16(a), 354.26(a), 354.28(a).

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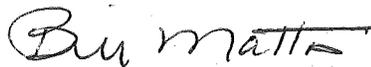
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BILL MATTOS, CALIFORNIA POULTRY FEDERATION - PRESIDENT

The Federation supports recognition in the emergency regulations of the importance of all beneficial uses and believes such references should be expanded. Specifically, we recommend that the final version of § 354.24, expressly make supply reliability one of the sustainability goals. Similarly, the evaluation criteria in § 355.4 should expressly address water supply reliability. Currently, dCCR § 355.4 specifically mentions beneficial uses only in terms of "consideration" of interests (at (b)(4)), and it lists only human consumption as a designated water usage (at (b)(11)). The evaluation criteria in the final regulations also should include impairment of water supply reliability, including reasonable demands for all beneficial users and uses of groundwater.

Please contact me if you need any further information. The Federation looks forward to working with the Department and local agencies on the continued implementation of the Sustainable Groundwater Management Act.

Sincerely,



BILL MATTOS  
President

cc: Tom Bower, Foster Farms  
David Pitman, Pitman Family Farms  
Mike Leventini, Petaluma Poultry Processors  
Lillian Zacky, Zacky Farms  
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