



CENTRAL DELTA WATER AGENCY

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Via email: lgrober@waterboards.ca.gov

Les Grober
State Water Resources Control Board

Re: Comments on Draft Modeling Scenarios for Southern Delta Water Quality Objectives.

Dear Les,

The Central Delta Water Agency (CDWA) joins in the comments submitted on the above matter by the South Delta Water Agency via email to you dated May 24, 2007, and hereby submits some additional comments for your consideration.

The goal of the proposed modeling scenarios was seemingly not articulated and, thus, the goal is not clear. If the goal is to model potential scenarios to meet the future objectives then it would appear such modeling is premature and should await the proposed comprehensive evaluation of what objectives are necessary to adequately protect agricultural beneficial uses since those objectives may or may not be the same as the existing standards (i.e., they could be more or less stringent, could be moved to different locations, could involve additional monitoring locations, etc.).

If the goal, instead, is to help the Projects find a way to meet their existing obligations to meet the existing objectives, then it is not clear how such assistance falls within the scope of the instant SWRCB periodic review of those objectives.

In any event, Congress makes it clear in PL 108-361 (HR 2828 [October 25, 2004]) that the Secretary of the Interior:

[S]hall acquire water from willing sellers and undertake other actions designed to decrease releases from the New Melones Reservoir for meeting water quality standards and flow objectives for which the Central Valley Project has responsibility to assist in meeting allocations to Central Valley Project contractors from the New Melones Project.

(PL 108-361, Section 103(f)(1)(F); 118 Stat 1681, pp. 1694-1695, emphasis added.)

Regardless of the goal of the proposed modeling, the modeling does not appear to reflect this Congressional mandate to so acquire such water and undertake other actions. Instead, the proposed modeling appears to do the direct opposite, i.e., to maximize use of New Melones to meet those objectives regardless of the needs of the local San Joaquin County CVP contractors.

Since any modeling within the scope of the instant periodic review appears premature (and potentially wasteful) in light of the uncertainty of what objectives are necessary to adequately protect agricultural beneficial uses, and since Water Code section 13241 directs the SWRCB to consider “[w]ater quality conditions that could reasonably be achieved through the coordinated control of all factors which affect water quality in the area” when establishing those objectives, if the SWRCB desires to move forward pending the evaluation of the adequacy of the existing objectives, then, rather than conduct (premature and potentially wasteful) modeling, the SWRCB should consider devoting its scarce resources towards identifying “all [of those controllable] factors” and begin evaluating the extent they can be controlled in the short term and long term (to the extent the SWRCB and/or Regional Board has not already done so). (Emphasis added.)

One of the most obvious of those controllable factors is the importation of salt from the Delta to areas which directly drain salty surface or subsurface waters into the San Joaquin River or to areas upslope from such areas which generate hydraulic pressure which thereby increases the drainage of such waters from the downslope lands into the San Joaquin River. As the SWRCB explains in D-1641:

[T]he SWRCB finds that the actions of the CVP are the principal cause of the salinity concentrations exceeding the objectives at Vernalis. The salinity problem at Vernalis is the result of saline discharges to the river, principally from irrigated agriculture, combined with low flows in the river due to upstream water development. The source of much of the saline discharge to the San Joaquin River is from lands on the west side of the San Joaquin Valley which are irrigated with water provided from the Delta by the CVP, primarily through the Delta-Mendota Canal and the San Luis Unit. The capacity of the lower San Joaquin River to assimilate the agricultural drainage has been significantly reduced through the diversion of high quality flows from the upper San Joaquin River by the CVP at Friant. The USBR, through its activities associated with operating the CVP in the San Joaquin River basin, is responsible for significant deterioration of water quality in the southern Delta.

(Emphasis added.)

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A meaningful study, to the extent the SWRCB feels compelled to embark on studies prior to the evaluation of the adequacy of the existing standards, would be to study the extent to which the Project's importation of such salt and the subsequent discharge of such salt into the San Joaquin River can be controlled either by reducing such importation or by reducing such discharge, or both. While the importation of such salt can clearly be controlled and theoretically reduced to zero, the examination of the extent to which the discharge could be controlled (e.g., by holding back drainage water for release during times of greater assimilative capacity, etc.) regardless of the control of the importation would appear to be a worthwhile investigation to the extent it has not already been undertaken.

With regard to the proposed modeling it is rather startling that the scenarios appear to entirely ignore the well recognized impacts on salinity in the San Joaquin River which result from such importation and discharge and make no attempt to model the effects on salinity that would or could result from controlling/altering that importation and/or discharge. It is my understanding that there are models such as the "SJRIO Model" that are available and precisely designed to model such effects. To the extent there is a desire to get started with modeling, modeling such effects should be a mandatory component of such modeling.

Thank you for considering these comments and concerns.

Very truly yours,



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cc via email: Dean Ruiz
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