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State Water Resources Control Board

August 27, 2020

**Via Electronic Mail and  
First Class Mail**

Ms. Molly White,  
Chief, Water Operations Office  
Division of Operations and Maintenance  
Department of Water Resources  
3110 El Camino Avenue, Suite 300  
Sacramento, CA 95821

Re: Notices Regarding Exceedances of Southern Delta Agricultural Water Quality Objective

Dear Ms. White,

We are in receipt of:

- your notice dated April 22, 2020, informing the State Water Resources Control Board (State Water Board) of the likelihood that the 30-day average electrical conductivity (EC) at the Old River at Tracy Boulevard Decision 1641 (D-1641) compliance location (Station P-12) would exceed 0.7 milliSiemens per centimeter (mS/cm) beginning about April 30;
- the May 1, 2020 email from Tracy Pettit-Polhemus of the Department of Water Resources (DWR) confirming the actual short-term exceedance;
- your follow-up letter dated May 21, 2020 offering additional data on salinity at Paradise Cut and Sugar Cut during the early May exceedance period;
- the August 18, 2020 email from Ian Uecker of DWR notifying us of emergency CVP pumping through Banks pumping plant on August 17, 18 and 19 to reduce on-peak power usage at Jones pumping plant and of planned JPOD operations beginning on August 25 to accommodate up to 2100 cfs of transfer water;
- the August 24 email from Mr. Uecker alerting us to the likelihood of exceedance of the 0.7 mS/cm salinity objective at Station P-12 beginning on or about August 25 and continuing to September 1, when the salinity standard changes to 1.0 mS/cm; and
- the August 25, 2020 email from Mr. Uecker providing notice of planned transfer and/or JPOD operations beginning September 1 as high as 3,300 cfs.

These notices have been referred to me for this response.

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

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As you are aware, D-1641 places requirements on DWR's water rights for the State Water Project (SWP) and the United States Bureau of Reclamation's (Reclamation) water rights for the Central Valley Project (CVP) (the SWP and the CVP are collectively referred to as the Projects) to meet water quality objectives included in the 1995 Bay-Delta Water Quality Control Plan (Bay-Delta Plan). D-1641 specifically requires the Projects' operations to meet a 30-day running average EC level not to exceed 0.7 mS/cm from April through August and 1.0 mS/cm for the remainder of the year at Station P-12 and other southern Delta compliance locations.

In the course of adopting the 2018 updates to the Bay-Delta Plan for Lower San Joaquin River Flows and Southern Delta Salinity, the State Water Board determined, based on substantial evidence in the record of its proceedings, that a revised EC objective of 1.0 mS/cm year round is sufficiently protective of southern Delta agricultural beneficial uses. However, the State Water Board has not yet implemented the updated salinity objective. Accordingly, the D-1641 0.7 mS/cm 30-day average EC requirement is in effect until September 1. In addition, the United States Environmental Protection Agency has not approved or disapproved the revised salinity objective pursuant to its limited review authority under the federal Clean Water Act.

DWR and Reclamation are currently engaged with the State Water Board and potentially impacted parties in developing a Comprehensive Operations Plan (COP) to address the operational impacts of the Projects in the southern Delta. DWR and Reclamation are currently updating the COP to address comments on the initial draft of the COP. Upon completion of those updates, the COP will be submitted to the State Water Board's Executive Director for review and possible approval. Upon completion and implementation, the COP is expected to achieve improved water quality monitoring and maintenance in the southern Delta and assist with implementation of the updated southern Delta salinity objective. In addition to work on developing the COP, DWR submitted its plan for installation and operation of the southern Delta interior temporary barriers for the 2020 agricultural irrigation season, began installation of the barriers on May 1 and has been operating the barriers since June. The purpose of the temporary barriers is to improve water levels and water quality in the southern Delta to protect agricultural uses.

In my capacity as the Delta Watermaster, I have exercised discretion not to take action related to the Projects' exceedances of the 0.7 mS/cm salinity standard at Station P-12. Further, following consultation with State Water Board colleagues, I acknowledge the Projects' planned JPOD operations to facilitate approved water transfers through September 30.

I will consider DWR and Reclamation's efforts to develop and implement the COP and to adjust Project operations to address potential impacts to southern Delta agriculture in

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determining whether to take any additional action related to any future salinity exceedances. Please continue to work with the State Water Board and to provide immediate notice of any changes in salinity compliance, including if the 30-day average EC at any of the southern Delta salinity compliance locations approaches or exceeds 1.0 mS/cm after September 1.

Should you have any questions, please contact me for further discussion.

Sincerely,



Michael Patrick George,  
Delta Watermaster

cc: via email

Tracy Pettit-Polhemus  
Tracy Hinojosa  
John Leahigh  
Ian Uecker  
Jacob McQuirk  
Anna Fock  
Kristin White  
Liz Kiteck  
Tom Patton  
Amy Aufdemberge  
Eileen Sobeck  
Eric Openheimer  
Erik Ekdahl  
Diane Riddle

David Coupe  
Garrett Lenahan  
John Herrick  
Dante Nomellini  
Jennifer Pierre  
Rebecca Akroyd  
Tim O'Laughlin  
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Josh Grover  
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Thomas J. Shepard, Sr.