Technical Appendix D: Assessment of Water Unavailability Issues Within the Legal Delta

This appendix provides additional background information used to evaluate water unavailability in the Legal Delta portion of the Sacramento-San Joaquin Delta (Delta) Watershed.

Introduction

The evaluation of water unavailability for diversion in the Legal Delta is complex due to a number of factors, including (1) the considerations of tidal influence on freshwater residence time and location in the Legal Delta ~~as well as~~and on water quality (e.g., its suitability for agricultural use), (2) the operations of the State Water Project (SWP) and Central Valley Project (CVP) (collectively the ~~"~~Projects~~"),)~~ that ~~-~~release previously stored water from upstream ~~storage~~reservoirs for use upstream and in the Legal Delta, over which water they retain claim and control for various beneficial uses, and (3) ~~natural~~ depletions of water in the Legal Delta due to evaporation from open water and transpiration of aquatic ~~and~~, riparian, and irrigated vegetation, ~~concerning~~ which there ~~is some uncertainty. The~~are challenges measuring and estimating.

Notwithstanding the inherent challenges of administering the water rights system within those complex circumstances, the Division of Water Rights (Division) has continued to seek and accept input on how to refine the Water Unavailability Methodology for the Delta Watershed (Methodology) ~~summary report explains~~and to apply the Methodology within the Legal Delta. While those efforts to refine and fairly apply the Methodology will continue, as authorized under the drought emergency regulations currently in place and proposed for readoption, this revised appendix provides the latest and refined response to feedback and suggested improvements of the Methodology as applied within the Legal Delta.

In evaluating valuable critiques of the Methodology, the State Water Resources Control Board (State Water Board or Board) recognizes that not all challenges in application ~~of a residence time longer than one month is not warranted at this time given the extremely dry~~ can be resolved based on currently available data. The State Water Board is also continuing to support long-term initiatives to improve Legal Delta water use data to address lingering drought response challenges. Under current

circumstances of persistent drought within the Delta watershed, however, this appendix is appropriate to support implementation of the drought emergency regulations.

Since the beginning of June 2022, the Projects have been required to release previously stored water to meet water quality objectives in the Legal Delta. Based on current and forecasted drought, precipitation, and storage conditions, such storage releases are expected to be necessary through at least the remainder of the current water year (through September 30, 2022) to maintain water quality in the Delta as required by State Water Board Decision 1641 (D-1641). Thus, it is vital to protect such storage releases from unlawful, unreasonable, or out-of-priority diversions that ~~have persisted for an extended period and the supplementation of flows in the Delta~~would interfere with ~~previously stored Project~~protecting water ~~for many months~~quality in the Delta. The ~~methodology also explains that only~~Methodology supports significantly deeper curtailments within the Delta watershed starting in July of 2022, not only to protect water quality but also to fairly administer the water rights priority system and the correlative shortage-sharing required among riparian claimants.

The Methodology accounts only for freshwater natural flows from the Sacramento and San Joaquin ~~Rivers are accounted for~~ watersheds as part of the considered supplies and ~~does not include~~excludes any water supplies from tidal inflows to the ~~Legal Delta because~~Delta. The reason for that exclusion, which has been challenged by numerous comments, is that saline water entering the ~~Legal~~ Delta from the San Francisco Bay via tidal action is assumed to be of insufficient quality to be usable for agricultural or municipal purposes. ~~This appendix provides further technical support for these assumptions used in the Methodology.~~

~~This analysis focuses on water unavailability in the southern Delta because the predominant source of fresh water into the Legal Delta is from the Sacramento River to the north. Therefore, the effects of hydrodynamics on residence time, water quality, and water unavailability would be greatest in the southern Delta.~~

Although the drought emergency regulation allows for further refinement to the Methodology and, potentially, consistent refinements to this technical appendix, this revision supports use of the Methodology to address the continuing drought.

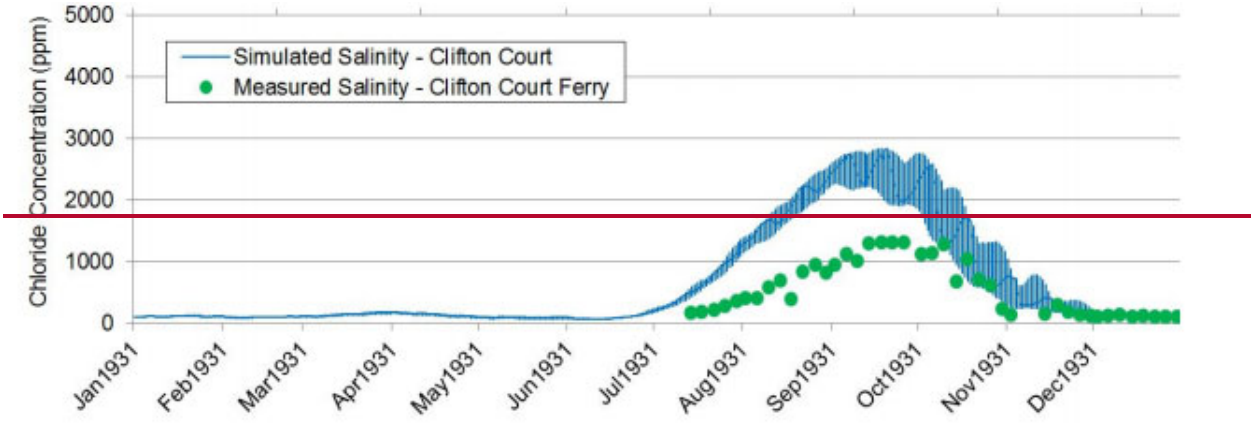
The Delta Watermaster will convene a meeting among parties who have offered both critiques of this appendix and suggestions for further refinements. The purpose of the meeting will be to consider implementation strategies that respond to the current drought and protect Delta water quality. The meeting is tentatively scheduled for July 14, 2022, so that any such strategies can be communicated and evaluated in conjunction with the State Water Board's consideration of the revised emergency regulation for readoption.

The analysis in this appendix has been updated from earlier versions in the following ways: (1) the Legal Delta consumptive use estimates have been updated to be consistent with the demands in the Methodology, including consistent return flow assumptions; (2) the natural and abandoned Legal Delta inflow has been updated to include forecasted data consistent with the information in the Methodology; and (3) other observed conditions have been updated to reflect conditions in 2022 where available.

Appropriate Use of Hydrodynamic Models

Hydrodynamic models may provide useful insights into the complex movement of water within the Legal Delta when appropriately applied and validated. ~~However, during periods of low inflow and high salinity, the commonly used California~~However, hydrodynamic models do not provide a sufficient answer to the basic mass balance problem of water unavailability for diversion. Hydrodynamic models such as the Department of Water Resources (DWR) Delta Simulation Model II (DSM2) ~~does not accurately replicate observed conditions. For example, in written comments submitted to the State Water Resources Control Board (State Water Board~~may provide fingerprinting results showing that some water diverted in the Legal Delta entered the Legal Delta months prior; however, these results do not provide useful guidance on when water is available or ~~Board)~~not available for users to divert, which must be informed by ~~the Byron-Bethany Irrigation District (BBID) on May 25, 2021, a report from Dr. Susan Paulsen was referenced that compared observed salinity to modeled salinity values from DSM2 (see Figure 1). The model-calculated chloride concentration (a measure of salinity) is approximately three times higher than the measured chloride concentration in the vicinity of Clifton Court Forebay in the southern Delta in August and twice as high as the measured concentration in October.~~mass balance accounting. Additionally, ~~the modeled results show a peak chloride concentration about 3 weeks earlier than observed. It is, therefore, inappropriate to rely solely upon results from a model for time periods when model~~it is not feasible to complete hydrodynamic model simulations for every update of the forecasted hydrology and analyze the results ~~are off by almost a factor of three. However, other analyses and methods can be used to understand the relationship between Delta outflow,~~ for each of the thousands of water ~~unavailability, and water quality. These other methods also demonstrate why models alone may be unable to correctly calculate salinity during low Delta outflow conditions, as very small volumes of high salinity water can have very large effects on chlorides, salinity, and electrical conductivity (EC).~~

~~Figure 1. Example Comparison of Observed Salinity and Modeled Salinity~~rights and specific points of diversion in the ~~Vicinity of Clifton Court Forebay, January–December 1931 (Paulsen, 2015)~~Legal Delta.

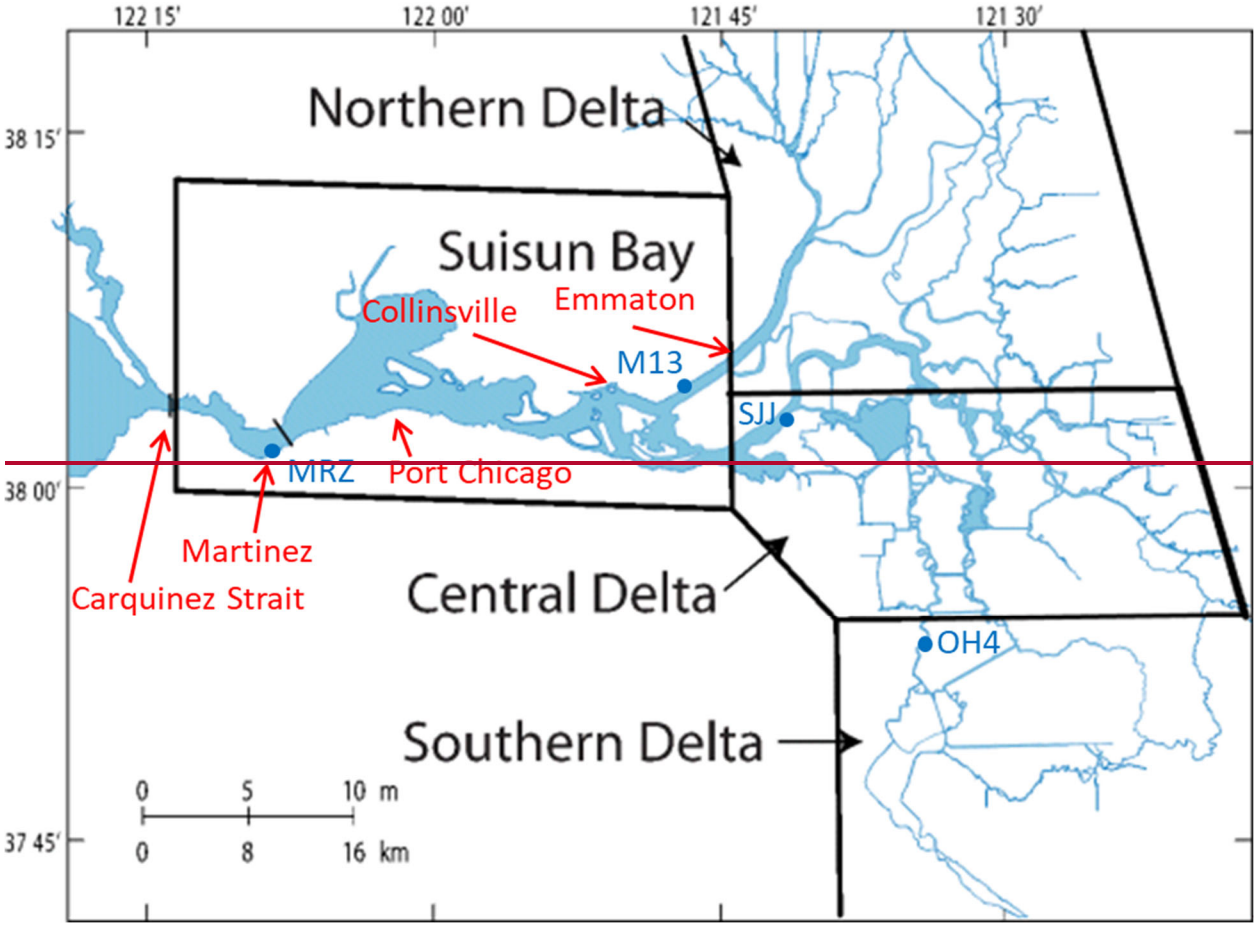

Chloride Concentration (ppm)
5000
4000
3000
2000
1000
0
Simulated Salinity - Clifton Court
Measured Salinity - Clifton Court Ferry
Jan1931
Feb1931
Mar1931
Apr1931
May1931
Jun1931
Jul1931
Aug1931
Sep1931
Oct1931
Nov1931
Dec1931

Residence Time

Simple flow volumes and estimates of residence times based on inflow that are applied broadly to the Legal Delta also may not provide a sufficient answer to inform determinations regarding water unavailability because they do not account for mixing from tidal action and consumptive water use within the Legal Delta. Mixing of water, particularly in Suisun Bay, makes the mixed water from that source too salty for beneficial use far earlier than simple residence times and fingerprinting may suggest because they may not correctly consider the effects of even small volumes of very saline water. For example, ~~fully~~ half of the water at a particular location could come from water that entered from the Sacramento River spanning several months, but if the other half came from Suisun Bay, with an ~~EC~~electrical conductivity (EC) of 20,000 microsiemens per centimeter (µs/cm), the water would have an EC of just over 10,000 µs/cm and would be unusable for almost all purposes.

Fortunately, bathymetry data available as a result of recent improvements in digital elevation models (USGS 2017) can be used to better understand the effects of extremely low Delta outflow on water unavailability and water quality in the Legal Delta. To improve hydrodynamic models in the Delta, the U.S. Geological Survey (USGS) and Inter-Agency Ecological Program (IEP) sponsored the development of a 10-meter horizontal grid of bathymetry in the Legal Delta region (USGS 2007). The survey determined the volume and area for the various regions of the Legal Delta shown in Figure 1 below.

Figure 1. Map of Legal Delta Regions and Suisun Bay (USGS 2007), with ~~State Water Board Decision~~ D-1641 Delta Outflow Compliance Locations (red), Relevant CDEC Gages (blue), and Other Points of Interest Added



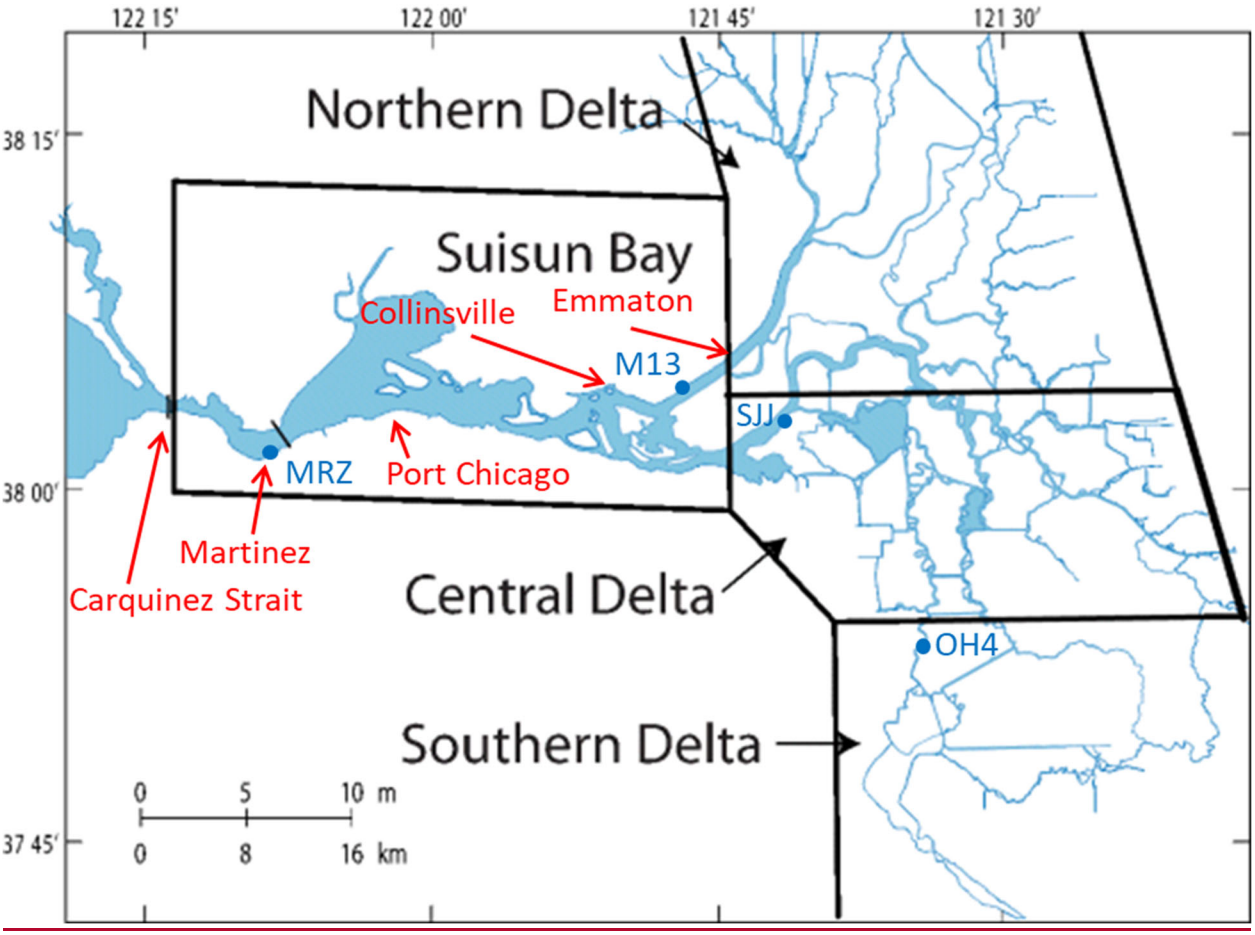


Table 1 contains the summary areas and volumes from the USGS report, with a conversion to volumes in thousand acre-feet (TAF).

~~Table 1~~Table 1 also contains tidal flux volumes based on variable tidal ranges for the four regions from California Data Exchange Center (CDEC) river stage gages~~.~~ for July 2021. The tidal variation is greatest to the west in Suisun Bay and decreases in the ~~eastern, northern~~Northern, Central, and ~~southern~~Southern regions of the Legal Delta.

Table 1. Legal Delta and Suisun Bay Channel Volumes and Tidal Flux~~, July 2021~~

Region	Water Surface Area (million ~~meters~~ ^{2}meters^{2})	Volume (million meters^{3})	Water Surface Area (acres)	Volume (TAF)	Tidal Range (feet)	Tidal Flux* (TAF/day)	~~Exchange Rate*~~Tidal Mixing Time** (days)
Suisun Bay	165	954	40,772	773	3.6	297	2.6
Northern Delta	74	407	18,286	330	2.9	108	3.1
Central Delta	66	267	16,309	216	2.4	78	2.8
Southern Delta	10	28	2,471	23	2.4	12	2.0
Total	***316***	***1,656***	***78,085***	***1,343***		***494***	***2.7***
Total without Suisun Bay	***150***	***702***	***37,066***	***569***		***197***	***2.9***
Areas and volumes from USGS (2007).							
Tidal ranges from CDEC river stage data for gages MRZ, M13, SJJ, and OH4 (see ~~Figure 2~~Figure 1): ~~http://cdec4gov.water.ca.gov/dynamicapp/wsSensorData~~https://cdec.water.ca.gov/dynamicapp/wsSensorData							

*~~-~~Tidal flux is the volume of water exchanged each day, which is calculated by multiplying water surface area by the tidal range multiplied by the frequency (i.e., twice per day).
**The ~~exchange rate~~tidal mixing time is calculated by dividing the channel volume ~~divided~~ by the tidal flux.

The Stockton and Sacramento Deep Water Ship Channels were deepened and widened for navigation, altering ~~Legal~~ Delta hydrodynamics by increasing tidal flow volumes and therefore increasing seawater dispersion into the ~~Legal~~ Delta (CCWD 2010). These large channels, not present in the early part of the century, are part of the reason that channel volumes are so much bigger in the ~~northern~~Northern and ~~central~~Central Delta than the ~~southern~~Southern Delta.

Table 1 may suggest, based on volume alone, that a pool of water in Suisun Bay and the ~~Legal~~ Delta could provide a prolonged water supply in the Legal Delta. However,

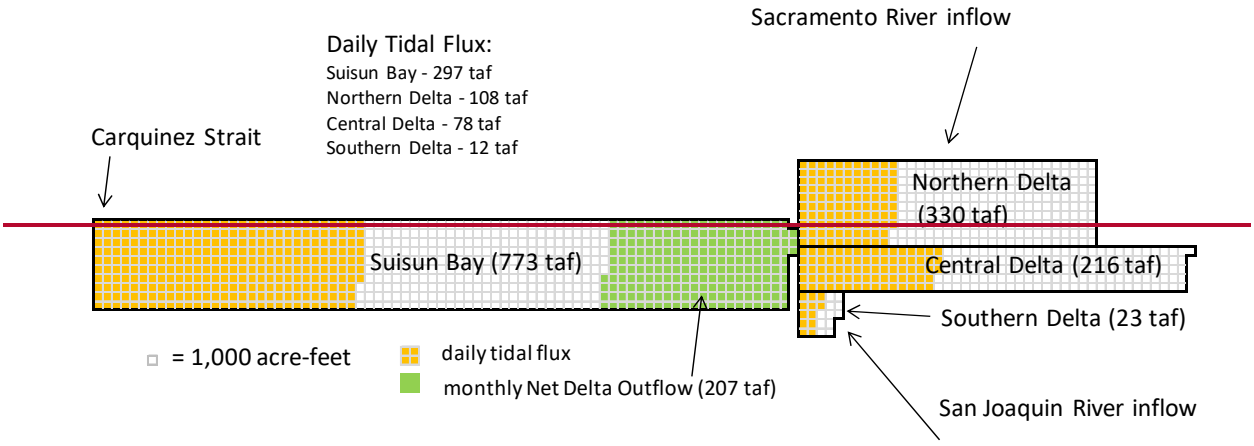
Table 1 also shows that an amount of water equal to the entire volume of Suisun Bay is exchanged by the tides over less than three days. Similarly, in each of the Legal Delta

regions an amount of water greater than the total channel volume is exchanged by the tides ~~over less than~~every three days (less than two days in the ~~southern~~Southern Delta). The large tidal influence greatly reduces the residence time of fresh water in the Legal Delta and ~~thus~~the mixing has a large effect on the water quality (as discussed ~~below~~ in the ~~following~~next section).

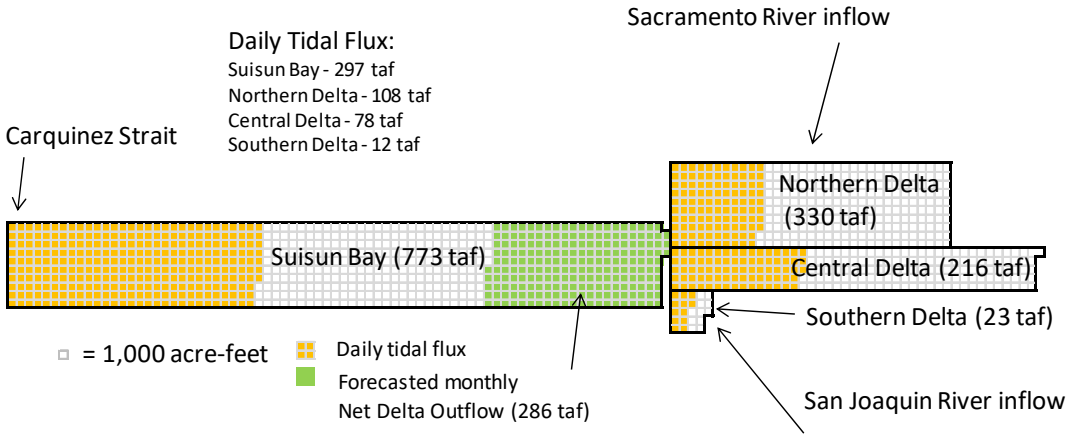
~~Figure 3~~Figure 2 shows the four regions of the Legal Delta scaled according to their channel volumes. Superimposed on the graphic ~~is a~~are scaled representation of ~~the 297 TAF/day~~each region's tidal flux and ~~the~~U.S. Bureau of Reclamation (Reclamation) forecasted net Delta outflow to Suisun Bay in July 2022 to maintain water quality; it is this positive net outflow that ~~stops~~inhibits saltwater from flowing into the ~~Legal~~ Delta. This schematic shows how large the daily tidal flux is in comparison to the volume of the regions of the Legal Delta. For example, the daily tidal flux in the ~~southern~~Southern Delta is equal to approximately half its channel volume. ~~Figure 3~~Figure 2 makes ~~two~~three things visually clear:

1. The ~~importance~~diurnal ebb and flow of the tides is overwhelmingly larger than the net freshwater outflow,
~~1.~~2. The tidal flux ~~compared to~~is significantly larger than the total volume of water in Suisun Bay and regions of the Legal Delta, and
~~2.~~3. The ~~relatively small~~ volume of water in ~~southern~~Southern Delta channels is modest compared to the volume of water in Suisun Bay and other regions of the Legal Delta.

Figure 2. Schematic of Suisun Bay and Legal Delta Regions with Scaled Channel Volumes, Daily Tidal Flux, and Forecasted Net Delta Monthly Outflow, July ~~2021~~2022



~~**In addition to tidal exchanges, irrigated and**~~



Irrigated, riparian, and aquatic vegetation consumes a large volume of water from ~~Legal~~ Delta channels. Consumptive use of water applied to crops in the Legal Delta can be estimated using the 2018 reports of diversion and use filed by diverters in the Legal Delta, as ~~estimated~~ represented by demand data in the Methodology. To account for ~~regulatory purposes, is presented in the DAYFLOW documentation (DWR 2019); DAYFLOW~~return flows, a reduction factor based on CalSim 3 results ~~for 2021~~has been applied to demands throughout the Delta watershed (see Section 2.2.11 of the Methodology report). Legal Delta reported diversions in 2018 are summarized in Table 2 below. Table 2 shows that demand for consumptive water use in the ~~southern~~Southern Delta is very large, especially ~~when compared with~~in comparison to the corresponding channel volumes in Table 1.

~~The monthly depletions~~Table 2. Demand for ~~each~~Consumptive Use Distributed by Legal Delta Region, May-October 2022

2018 Demand (TAF)	Suisun Bay (TAF)	Northern Delta (TAF)	Central Delta (TAF)	Southern Delta (TAF)	*TOTAL (TAF)*
May	1	75	36	59	*171*
June	0	121	56	81	*258*
July	0	142	63	83	*288*
August	0	109	46	63	*218*
September	0	74	24	40	*138*
October	0	44	16	16	*76*

Monthly water demands within each Legal Delta region are shown as a percent of channel volume in ~~Table 3. Table 3~~Table 3 below. Table 3 shows that demand for consumptive water use in the ~~southern~~Southern Delta is more than three times

(~~313~~360%) the volume of water in the ~~southern~~Southern Delta channels in the ~~month~~months of June and July and just under that in ~~June~~May and August. Therefore, without considering the twice daily tidal flux discussed above, and without considering diversions by the Projects from Clifton Court Forebay and the Jones Pumping Plant, there are three full exchanges of water in the ~~southern~~Southern Delta that are attributable to consumptive use~~.~~ if no diversions are curtailed. Without considering tidal flux, the ~~residence time~~total volume of water in the ~~southern~~Southern Delta ~~is~~channels would be consumed in about 10 days throughout May, June, July, and August. ~~Tidal flux has the effect of exchanging an amount equivalent to the volume of water in southern Delta channels around 15 times per month (one exchange every two days).~~

Table 3. ~~Gross Channel~~Monthly Depletions ~~Distributed by Delta Region, March~~as a Percent of Channel Volume, May-October ~~2021~~2022

Month	~~DAYFLOW~~Reported Total Delta ~~Gross Channel Depletions~~Demand for Consumptive Use (TAF)	Northern Delta ~~Depletions * (TAF)~~	Central Delta ~~Depletions * (TAF)~~	Southern Delta ~~Depletions * (TAF)~~
~~March 2021~~	~~80~~	~~41~~	~~18~~	~~22~~
~~April 2021~~	~~112~~	~~57~~	~~25~~	~~30~~
May~~ 2021~~	~~149~~171	~~76~~23%	~~33~~17%	~~40~~257%
June~~ 2021~~	~~223~~258	~~114~~37%	~~49~~26%	~~60~~351%
July~~ 2021~~	~~267~~288	~~136~~43%	~~59~~29%	~~73~~360%
August~~ 2021~~	~~232~~218	~~118~~33%	~~51~~21%	~~63~~273%
September~~ 2021~~	~~156~~138	~~80~~22%	~~34~~11%	~~42~~175%
October~~ 2021~~	~~114~~76	~~58~~13%	~~25~~7%	~~31~~68%

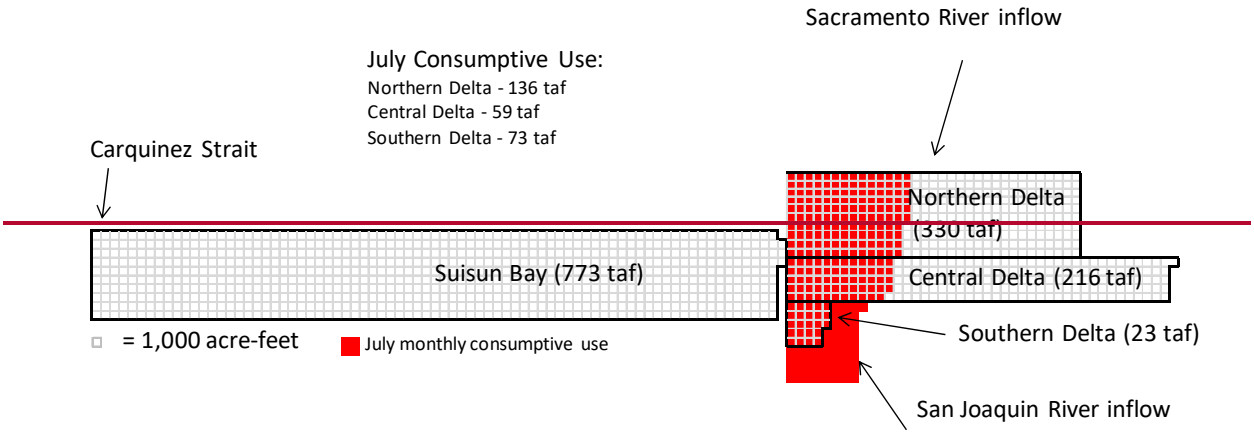
~~* Depletions for the three regions are based on a proportional distribution of total DAYFLOW Delta gross channel depletions based on the service areas of the North, Central, and South Delta Water Agencies.~~

~~**Table 3. Monthly Depletions as a Percent of Channel Volume, March–October 2021**~~

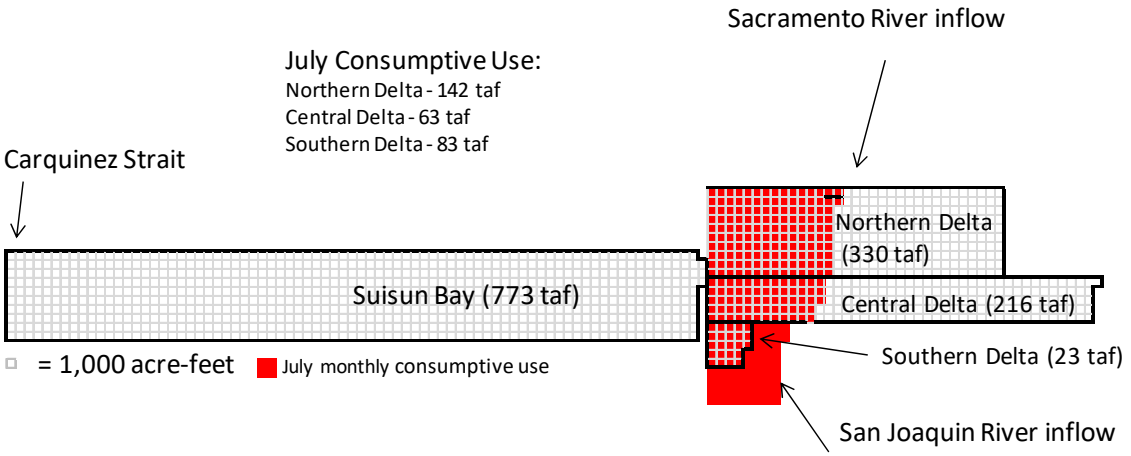
~~Month~~	~~DAYFLOW Delta Gross Channel Depletions (TAF)~~	~~Northern Delta~~	~~Central Delta~~	~~Southern Delta~~
~~March 2021~~	~~80~~	~~12%~~	~~8%~~	~~94%~~
~~April 2021~~	~~112~~	~~17%~~	~~11%~~	~~132%~~
~~May 2021~~	~~149~~	~~23%~~	~~15%~~	~~176%~~
~~June 2021~~	~~223~~	~~34%~~	~~23%~~	~~263%~~
~~July 2021~~	~~267~~	~~41%~~	~~27%~~	~~315%~~
~~August 2021~~	~~232~~	~~36%~~	~~24%~~	~~274%~~
~~September 2021~~	~~156~~	~~24%~~	~~16%~~	~~184%~~
~~October 2021~~	~~114~~	~~18%~~	~~12%~~	~~135%~~

~~Figure 4~~Figure 3 shows the July ~~2021 gross monthly depletions~~[1] consumptive use from ~~Table 3~~Table 3 for different regions of the Legal Delta in relation to their channel volumes. ~~This schematic~~Figure 3 clearly shows how the volume of consumptive use in the ~~southern~~Southern Delta greatly exceeds the volume of water that can be stored in ~~southern~~Southern Delta channels.

Figure 3. Schematic of Suisun Bay and Legal Delta Regions with Scaled Channel Volumes and Consumptive Use, July ~~2021~~2022



[1] ~~Shown in the figure as consumptive use because in July and other months with no precipitation, channel depletions and consumptive use are the same value.~~

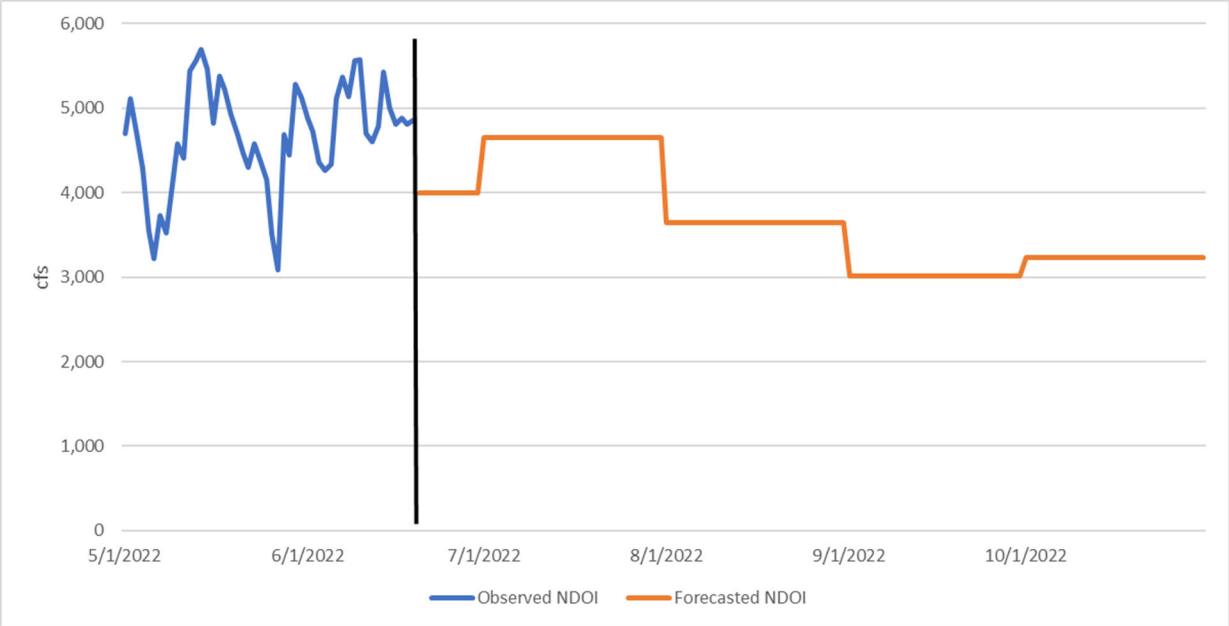


Simple estimates of residence time that only consider the total volume of the Legal Delta and inflow overestimate the residence time because they do not consider the enormous twice daily tidal flux, the variable channel volumes in different regions of the Delta, or consumptive water use. ~~When these factors are considered, the residence time is less than three days for Suisun Bay and the northern, central, and southern Delta. The northern Delta has a longer residence time than the other regions, but it is still well under a month.~~

Water Quality

In addition to decreased residence times attributable to tidal flux and consumptive use, the effects of reduced Delta outflow on water quality must also be considered for determining water unavailability. Although there ~~is~~would always be water present ~~at all times~~ in the channels of the ~~Legal~~ Delta, in the absence of releases of water from reservoir storage ~~upstream~~ by the Projects ~~that~~the water ~~is~~in the Delta channels would not necessarily be of suitable quality for agricultural or municipal use. One of the principal purposes of the Projects is to release adequate water to maintain Delta outflow at levels sufficient to ~~repel~~impede water in Suisun Bay from entering the ~~Legal~~ Delta. During low flow conditions, the typical minimum flow needed to maintain a freshwater barrier to repel salinity from entering the ~~Legal~~ Delta is a calculated net Delta outflow of 3,000 to ~~4,500~~5,000 cubic feet per second (cfs). Flows in this range and higher have been maintained to prevent salinity intrusion during May~~, June,~~ and June of 2022 and are forecasted to be maintained for this purpose in July ~~this year (Figure 5).~~through October of 2022 (see Figure 4). Flows approaching~~,~~ and lower than~~,~~ 3,000 cfs, even for short periods, can result in salinity intrusion into the ~~Legal~~ Delta.

Figure 4. Net Delta Outflow, May~~ – July 2021~~ 1-June 19 Recorded Values and June 20-October 31 Forecasted Values by the U.S. Bureau of Reclamation



Absent Project storage releases ~~in 2021~~, water quality in much of the ~~Legal~~ Delta would ~~have been~~be of a quality unsuitable for agriculture throughout much of ~~this~~the summer. While historical records of similarly dry periods may show that water was of sufficient quality for use throughout the summer, these periods did not include changes to the geography such as the deepening of ship channels or the increase in demand by

~~more~~other senior water users upstream, both of which have further degraded water quality.

~~Evaluation of Flows in the Legal Delta~~

~~Another way to evaluate the natural and abandoned flows that may be present in the Legal Delta is to evaluate conditions absent Project operations to determine how much water would be present in the Delta absent supplementation of Delta inflows with previously stored Project water and absent diversions by water users that have contracts with the Projects. The analysis conservatively assumes that all diversions by Project contractors are from Project previously stored water even though many of these water users have their own water rights and claims of right under which they would divert some portion of natural and abandoned flows reducing to some extent the water present in the Delta. This section presents an estimate of Legal Delta conditions without the operations of the Projects.~~

~~The amount of Project water released from previously stored water in Project reservoirs can be estimated by computing the difference between reservoir outflow and inflow (Project water is equal to outflow minus inflow). This assumes that all reservoir inflow is natural or abandoned. If the outflow is less than the inflow, the reservoir is storing water and there is no release of stored Project water occurring. To estimate the portion of Legal Delta inflow that originated as stored water releases from Project reservoirs upstream, the large deliveries of contract water by the Projects in the Sacramento, Feather, and American River basins need to be accounted for. Figure 6 shows the stretches of the rivers with Project reservoirs where Project contractors divert water and downstream locations that do not have significant Project contract diversions, described as Project or non-Project, respectively (described in more detail below).~~

~~From the Sacramento River, the largest CVP deliveries are to the Sacramento River Settlement Contractors that were allocated 75% of the contract amount, or about 1.6 million acre-feet (MAF), in 2021. These diversions primarily occur above Wilkins Slough. Therefore, it was assumed that the Projects were responsible for providing storage withdrawals to meet all depletions between Keswick Dam and Wilkins Slough. This is a very conservative assumption because the Sacramento River Settlement Contractors also have their own water rights and claims of right under which they would divert natural and abandoned flows that would not constitute a contract delivery. From Wilkins Slough to Freeport it was assumed that all depletions were from stream losses and non-Project diversions and therefore are not the responsibility of the Projects.~~

~~From the Feather River, the largest SWP deliveries are to the Feather River Service Area Contractors, which primarily divert from the Thermalito Complex below Oroville Dam. Similar to the Sacramento River, it was assumed that the Projects are responsible for all depletions between Oroville Dam and Thermalito Dam. Like the~~

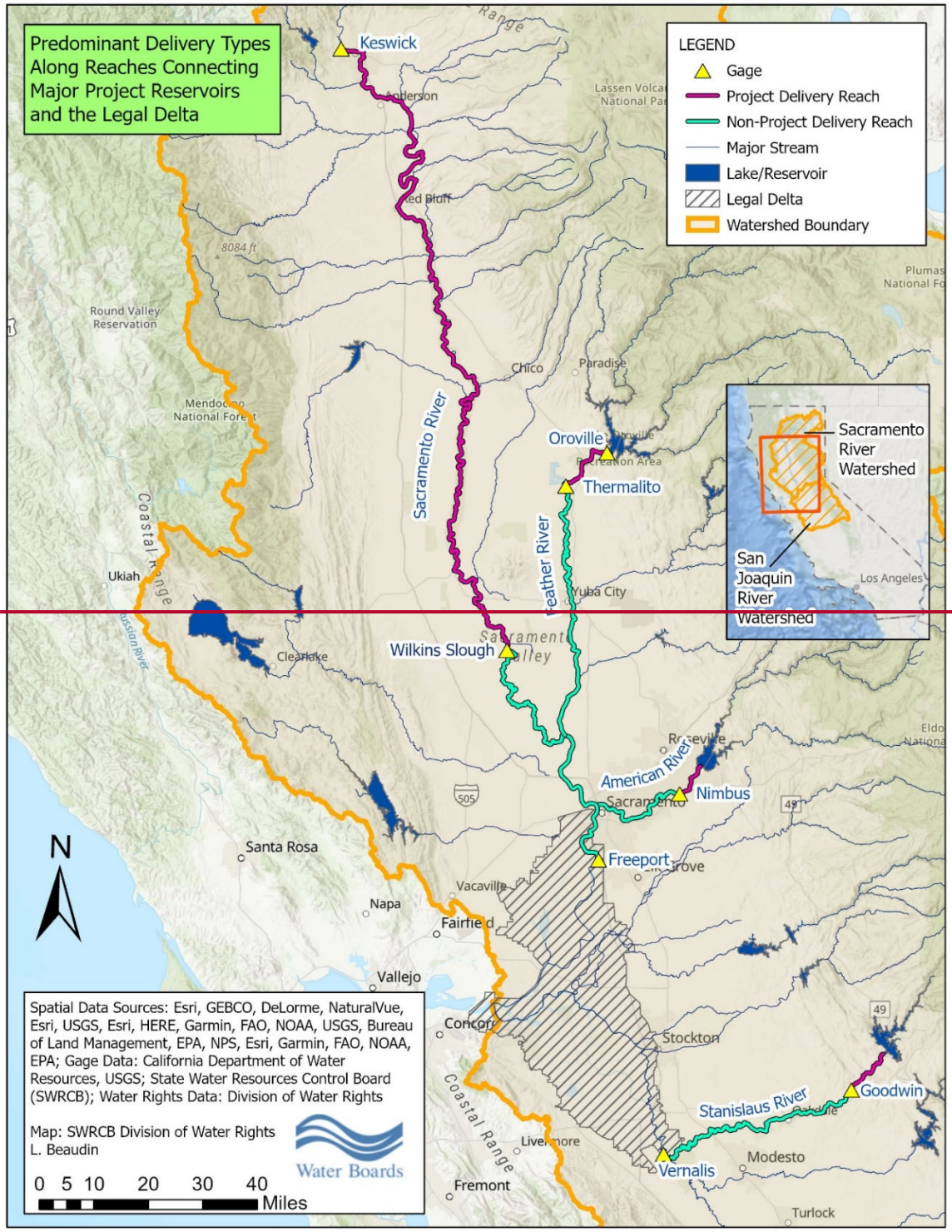
~~Sacramento River Settlement Contractors, this is also a very conservative assumption because the Feather River Service Area Contractors also have their own water rights and claims of right for which they would divert natural and abandoned flows. It was also assumed that inflows to the Feather from Kelly Ridge were abandoned. Depletions from below Thermalito Dam to Freeport were assumed to not be the responsibility of the Projects.~~

~~On the American River, most Project deliveries to urban contractors are directly from Folsom Reservoir or from the Folsom South Canal that diverts from Lake Natoma. Therefore, it was assumed that all Project storage releases below Nimbus Dam were present at Freeport.~~

~~On the San Joaquin River, Project deliveries occur above Goodwin Dam. Therefore, it was assumed that all depletions between New Melones Dam and Goodwin Dam were from previously stored Project water. Again, this is a conservative assumption because water users in this stretch also have their own water rights that they divert natural and abandoned flows under. All depletions between Goodwin Dam and Vernalis were then assumed to be from natural and abandoned flows.~~

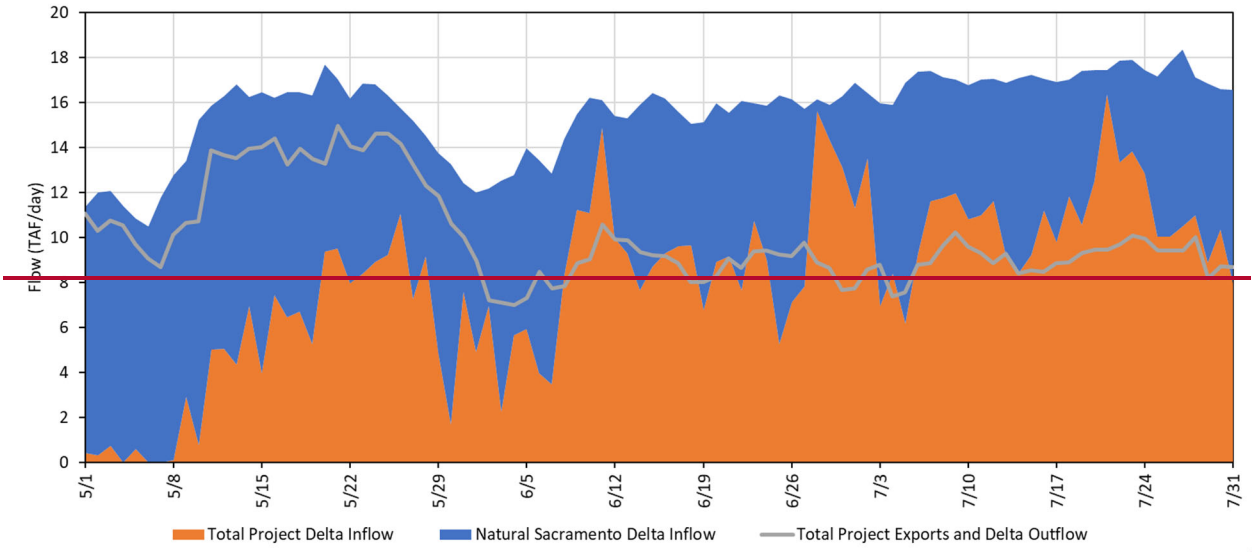
~~In summary, this method assigns all depletions between the major Project reservoirs and specified downstream control points (Wilkins Slough, Thermalito Dam, Nimbus Dam, and Goodwin Dam) to the Projects. All depletions downstream of these points, and upstream of inflow to the Legal Delta, are assigned to natural and abandoned flow. This method may slightly underestimate depletions of Project water because it does not account for other small Project diversions downstream of these control points (and upstream of the Legal Delta). It also likely underestimates depletions of natural and abandoned flows upstream of these points by Project contractors with their own water rights and other non-Project water right holders in reaches considered to be Project reaches. However, this method captures the major Project water depletions downstream of Project reservoirs and upstream of the Legal Delta. The natural and abandoned inflow estimated using this method is different than the unimpaired flows used in the Water Unavailability Methodology because the Methodology provides a total comparison of natural flow to water demands in the entire Delta watershed before any diversion has taken place. The method described above provides an estimate of natural and abandoned flow that reaches the Legal Delta after upstream diversions have taken place.~~

~~Figure 6. Predominant Delivery Types Along Reaches Connecting Major Project Reservoirs and the Legal Delta~~



~~The method also provides an estimate of Project water entering the Delta, which is calculated as the sum of the Project water below the upstream control points described above. The natural and abandoned Delta inflow was estimated as the total observed Delta inflow (including inflows from Delta Eastside Tributaries, Yolo Bypass, and Sacramento Regional Water Treatment Plant) minus the Project Delta inflow. Figure 7 shows estimates of Legal Delta inflow from previously stored Project water and natural or abandoned flow, as well as a line representing total Project exports and Delta outflow. From early June through July, more Project water entered the Legal Delta than was exported and provided as Delta outflow. Total Legal Delta inflow from the Projects increased over these three months to maintain the freshwater barrier so that salt did not intrude into the Legal Delta.~~

~~Figure 7. Previously Stored Project Water and Natural and Abandoned Flow entering the Legal Delta, May–July 2021~~



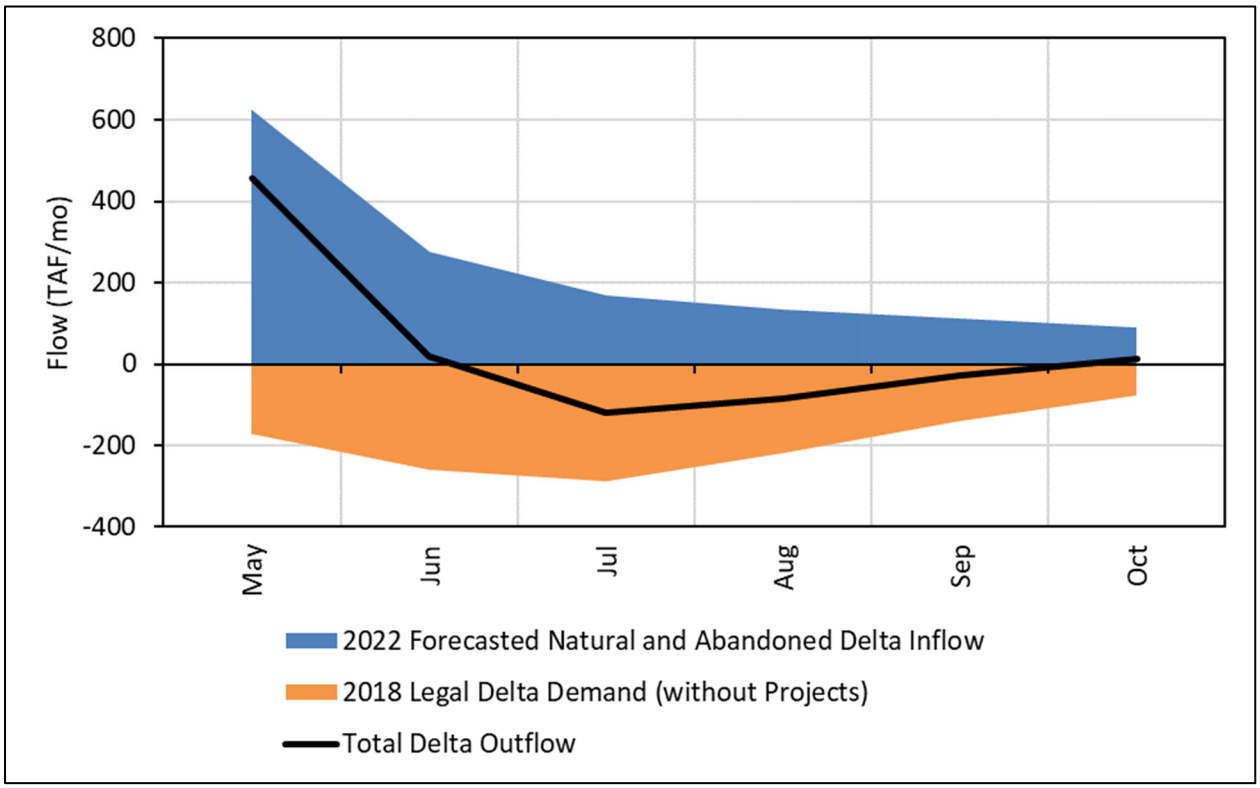
The Methodology estimates water supply available to meet demand throughout the watershed. To determine the water supply available in the Legal Delta, the supply required to meet upstream demands senior to Legal Delta diverters is subtracted from the total watershed supply. While supply estimates are available on a daily timestep from the California Nevada River Forecast Center (CNRFC), the reported demand data is only available on a monthly timestep. If curtailments are issued based on watershed-wide unavailability in both the Sacramento and San Joaquin River watersheds based on the allocation priorities embedded in the Methodology, then the calculated Delta outflow met by natural and abandoned flows is zero. Because the Methodology first allocates water to meet any existing water right demands, the only time there is any excess

natural and abandoned flow to contribute to calculated Delta outflow is when all demands are satisfied based on the watershed-scale analysis in at least one watershed (either the Sacramento or San Joaquin).

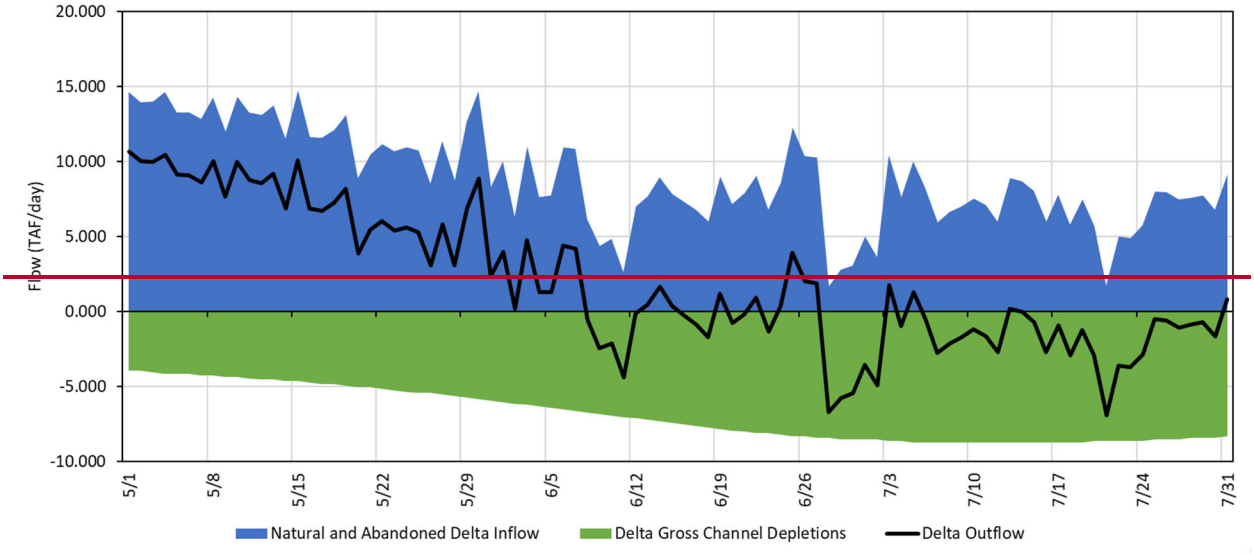
Without the release of Project ~~Water~~water from storage, the only Legal Delta inflow would be from remaining natural and abandoned flows~~.~~ after upstream demands senior to Legal Delta users have been met. If Legal Delta depletions remained the same, they would be met by natural and abandoned flows until those are fully consumed, and calculated Delta outflow would decrease to zero and then go negative~~. Figure 8~~ if demands were not curtailed. Figure 5 shows the effect that removing Project water would have on calculated Delta outflow, going from ~~slightly~~ positive in ~~May~~June to negative in ~~June and July.~~ July, August, and September assuming no diverters in the Legal Delta were curtailed other than the Projects. In the absence of previously stored Project water, calculated Delta outflow becomes negative (reverse Delta outflow) over these three months because inflow of natural and abandoned flow decreases ~~at the same time that~~while Legal Delta depletions increase from May through July.

Figure 5. Forecasted Natural and Abandoned Legal Delta ~~Inflows and Outflows~~Inflow for May-September 2022, Assuming CNRFC 50% Exceedance

Hydrology and Legal Delta Demands without ~~SWP and CVP Storage Releases~~the Projects, May-October 2022*



*June 18-30 and ~~Exports, May~~ July ~~2021~~ October supply represented by 50% exceedance forecasts from CNRFC issued on June 18, 2022.



As shown in ~~Table 5~~Table 4 below, Legal Delta inflow from natural and abandoned flows ~~exceeded~~exceed Legal Delta consumptive use in May and June. Therefore,

these inflows could have provided the water consumptively used in the Legal Delta. In ~~June and~~ July, August, and September, however, ~~with diminishing flows, net~~ consumptive use in the Legal Delta ~~exceeded inflows from~~is forecasted to exceed natural and abandoned ~~flows~~inflows by upwards of 100 TAF/month.

Table 4. Calculated Net Delta Outflow without Project Inflows, May-~~July 2021~~October 2022

Month	Natural and Abandoned Legal Delta Inflow * (TAF)	~~Net~~Legal Delta Consumptive Use ** (TAF)	Calculated Net Delta Outflow (TAF)	Calculated Net Delta Outflow (cfs)
May ~~2021~~	~~302~~626	~~148~~171	~~155~~455	~~2,514~~7,405
June ~~2021~~	~~194~~277	~~220~~258	~~-26~~19	~~-437~~325
July ~~2021~~	~~198~~168	~~268~~288	-~~70~~120	-1,~~138~~955
August	134	218	-84	-1,368
September	111	138	-27	-448
October	89	76	13	220

*June 18-30 and July-October supply represented by 50% exceedance forecasts from CNRFC issued on June 18, 2022.
**Excluding Project demands.

Without Project storage releases, there ~~would~~will not ~~have been~~be enough natural and abandoned Legal Delta inflow in ~~June and~~ July ~~2021~~through September 2022 to prevent the net inflow of water from Suisun Bay into the ~~Legal~~ Delta. Instead of the ~~average~~ net Delta outflow of ~~3,300~~4,652 cfs ~~that occurred in June and July (Figure 5~~forecasted by Reclamation for July (see Figure 4), there would ~~have been~~be a negative calculated net Delta outflow in ~~June and~~ July~~.~~[2] through September. Inflow of higher saline water from the west would ~~have been~~be particularly large in the ~~southern~~Southern Delta because it has disproportionately small channel volumes relative to its depletions. ~~Table 6~~Table 5 shows that specific effect in the ~~southern~~Southern Delta, where consumptive use ~~exceeded~~exceeds natural and abandoned inflows from the San Joaquin River in ~~May,~~ June~~, and July~~ through October. The combined net inflow into the ~~southern~~Southern Delta from the ~~central~~Central Delta and Suisun Bay for these ~~three~~five months, absent Project water from the San Joaquin River, would ~~have been 115~~be 212 TAF – ~~five~~nearly ten times the 23 TAF volume of ~~southern~~Southern Delta channels.

~~[2] No additional use or export in the Legal Delta, other than net Legal Delta consumptive use, are considered in this calculation: diversions by the North Bay Aqueduct, Contra Costa Canal, and Byron Bethany Irrigation District are considered to be zero.~~

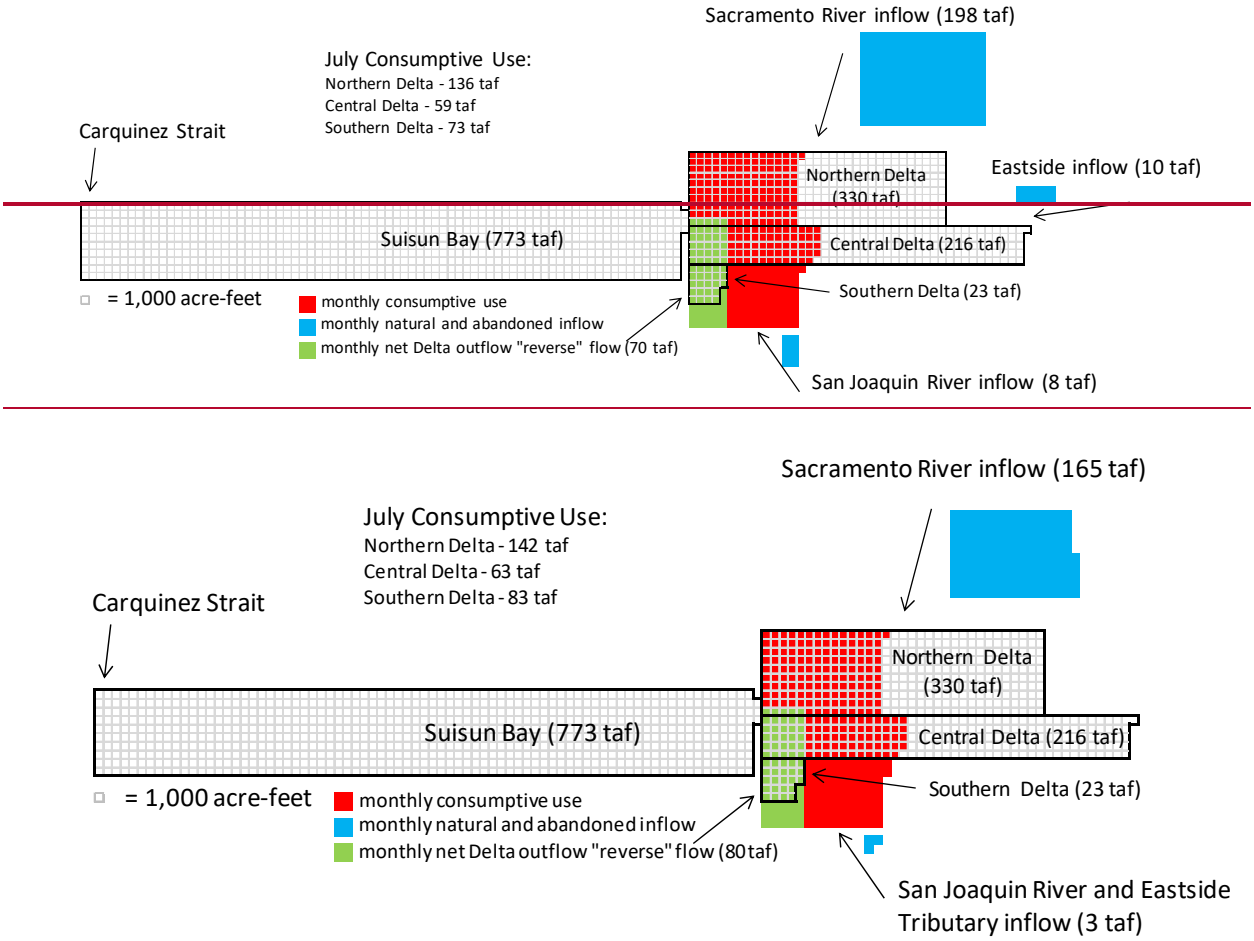
Table 5. Calculated Southern Delta Replacement Water with No ~~Legal Delta Inflow from San Joaquin River~~Previously Stored Project Releases, May-~~July 2021~~October 2022

Month	Natural and Abandoned San Joaquin River Inflow to Legal Delta * (TAF)	Southern Delta Consumptive Use ** (TAF)	"Replacement" Inflow to Southern Delta (TAF)
May~~ 2021~~	~~37~~69	~~40~~59	~~3~~-10
June~~ 2021~~	~~13~~50	~~60~~81	~~47~~30
July~~ 2021~~	~~8~~3	~~72~~83	~~64~~80
August	3	63	60
September	2	40	39
October	3	16	12
Sum	~~57~~129	~~172~~341	~~115~~212

~~Figure 9~~*June 18-30 and July-October supply represented by 50% exceedance forecasts from CNRFC issued on June 18, 2022.
**Excluding Project demands.

Figure 6 shows ~~the~~forecasted conditions ~~that would have occurred in July 2021 if there had been no~~for July 2022 without Project water entering the Legal Delta. The figure shows consumptive use in the three Legal Delta regions relative to their channel volumes, the volume of natural and abandoned Legal Delta inflow, and calculated net (reverse) Delta outflow~~, which reverses~~ in July. The forecasted volume of Sacramento River ~~and eastside tributary~~ natural and abandoned flow (~~198 + 10 = 208~~165 TAF) is ~~just slightly higher~~less than the combined Northern and Central ~~Legal~~ Delta ~~July~~ consumptive use (~~136 + 59 = 195~~142 + 63 = 205 TAF). The volume of San Joaquin River natural and abandoned flows (~~8~~3 TAF) is a small fraction of ~~southern Legal~~Southern Delta consumptive use (~~73~~83 TAF). This shows that, with continued ~~use~~uncurtailed Legal Delta diversions and in the absence of Project water, ~~southern Legal~~the Northern, Central, and Southern Delta channels would be pulling water from ~~the central Legal Delta and~~ Suisun Bay. ~~The figure~~Figure 6 shows that there would be calculated negative net Delta outflow from the ~~central~~Central and ~~southern Legal~~Southern Delta because consumptive use would be disproportionately higher than freshwater inflow.

Figure 6. Schematic of Suisun Bay and Legal Delta Regions with Scaled Channel Volumes, Consumptive Use, Forecasted Natural and Abandoned Legal Delta Inflow, and Calculated Net Delta Outflow Reverse Flow, July ~~2021~~2022

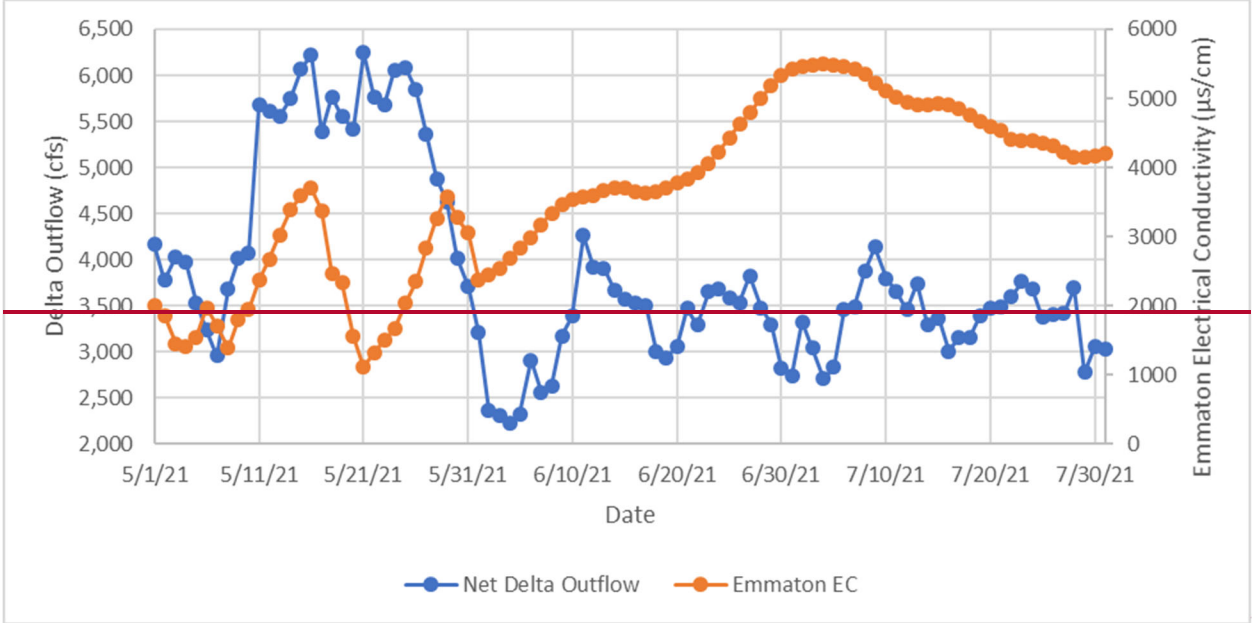


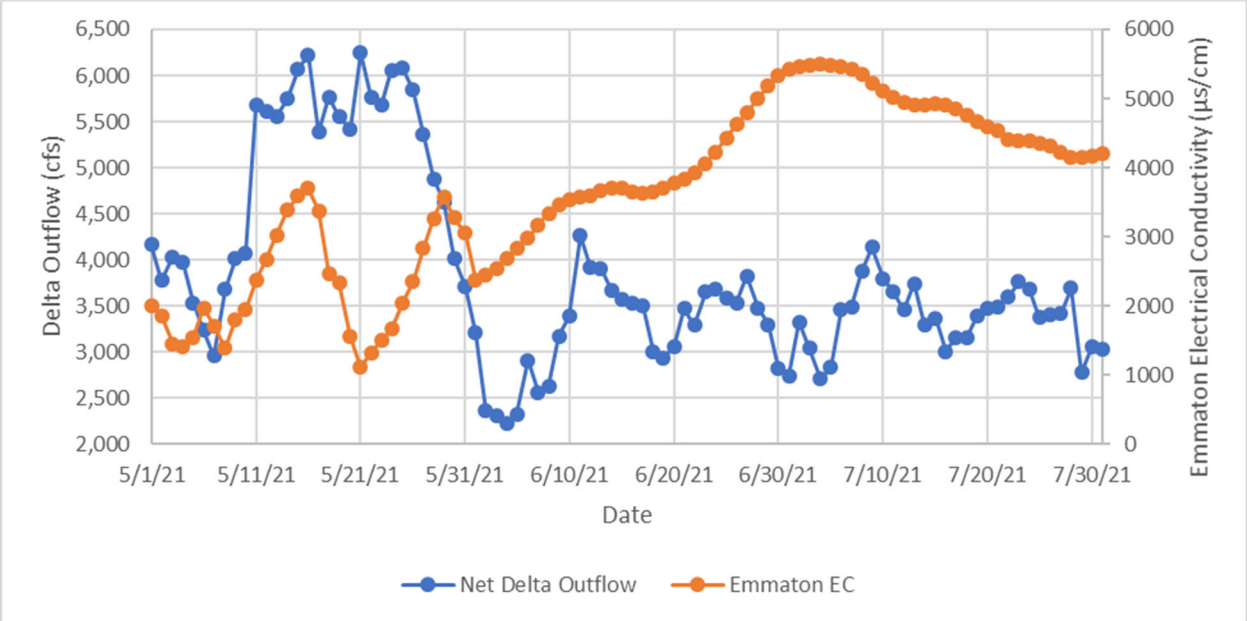
Estimation of Water Quality in the Legal Delta Without Previously Stored Project Water

This section presents a discussion of Legal Delta water quality absent Project operations. Without the presence of upstream Project storage releases ~~in the Legal Delta~~, diversions in the ~~southern~~Southern Delta that exceed inflows from upstream would cause water from Suisun Bay and the ~~central~~Central Delta to enter the ~~southern~~Southern Delta. ~~The~~For example, the average EC in the far western boundary of the ~~Legal~~ Delta, at Emmaton (see ~~Figure 2~~Figure 1), was approximately 2,200 µs/cm in May 2021, when the calculated average net Delta outflow was over 5,000 cfs. The

EC increased to an average of over 4,000 µs/cm in June and July 2021, when the calculated average net Delta outflow dropped to an average 3,300 cfs ~~(Figure 10).~~(see Figure 7 below). This relatively large increase in salinity occurred in response to a relatively small reduction in calculated net Delta outflow from 5,000 to 3,300 cfs. This minimal Delta outflow was still enough to maintain a freshwater barrier between Suisun Bay and the ~~Legal~~ Delta, but salinity increased at Emmaton due to more water from Suisun Bay being mixed with Sacramento River water ~~at Emmaton. Absent any Delta outflow, large volumes of Suisun Bay water and its associated salts would start entering the Legal Delta~~.

Figure 7. Historical Recorded Net Delta Outflow and Electrical Conductivity at Emmaton, May–July 2021





The EC at the ~~far~~ eastern boundary of Suisun Bay, downstream of Emmaton, would have been far higher if there had been no Delta outflow to freshen water in Suisun Bay. Further west in Suisun Bay, the average EC from May– through July 2021 was 11,000, 20,000, and 31,000 µs/cm at Collinsville, Port Chicago, and Martinez, respectively (east to west, see ~~Figure 2).~~ Figure 1).

Without previously stored Project releases, higher natural and abandoned flows in May 2022 would have started the season with sufficient water quality; however, without the benefit of Project water flowing into the Delta, ~~this~~the high EC water from Suisun Bay would ~~have intruded~~intrude into the ~~Legal~~ Delta ~~and would mix much more with water already present because of the large daily tidal flux.~~in June and July. It does not take much of this high salinity water to have a large effect on water quality~~;~~: a 50/50 mix of 20,000 µs/cm water from central Suisun Bay would result in a mixed water quality of over 10,000 µs/cm, assuming there was no salt in the other components of the mix.

Without Project water, conditions in the ~~southern~~Southern Delta in July ~~2021~~ September 2022 would ~~have been~~be far worse than a 50/50 mix of Martinez-quality water because there would be very little low-salinity water present to mix with. Only ~~83~~ TAF of natural and abandoned San Joaquin River water ~~would have flowed into~~ is forecasted to be available in the ~~southern~~Southern Delta in July ~~2021~~2022 (see Table 5), while consumptive use ~~was 73~~is 83 TAF (see Table 2). Only ~~11~~4 percent of the monthly consumptive use would have been met by low-salinity water from the San Joaquin River. The other ~~89~~96 percent would have to have been met with water that flowed into the ~~southern~~Southern Delta through the ~~central~~Central Delta from Suisun Bay. A 90/10 mix of Martinez and San Joaquin River water could approach 18,000 µs/cm.

Although some salt-tolerant crops can continue to be grown with relatively saline water, doing so requires very high leaching fractions to move the salts through the root zone. The types of soils in the ~~southern~~Southern Delta do not provide the high leaching requirements needed to support high salinity irrigation water, and salt-tolerant crops are not generally grown in the ~~southern~~Southern Delta. Even if such crops were grown in the ~~southern~~Southern Delta and such leaching were possible, there is nowhere for the leached water to go except back into the ~~southern~~Southern Delta channels. With no net Delta outflow, the ~~southern~~Southern Delta is a closed system where the salt levels would continue to rise.

Slight to moderate restrictions on use are generally considered for irrigation water with salinity between 700 and 3,000 µs/cm, with severe restrictions for salinity over 3,000 µs/cm (Ayers and Westcot, 1985). Determining the sensitivity of crops to highly saline water is not a simple matter because the effect on the crop is based on the salinity in the root zone, which can be higher than the salinity of applied irrigation water. This is because soil salinities generally increase as water is consumed by the plant and salts are left behind in the soil.

Sensitive crops start showing declines in yield for soil-water salinities (soil extract EC) over 2,000 µs/cm, with 100~~%~~ percent yield reduction at 8,000 µs/cm. Moderately sensitive crops start showing reductions at 3,000 µs/cm, with 100 percent reduction at 16,000 µs/cm. Moderately tolerant and tolerant crops start showing reductions at 7,000 and 10,000 µs/cm, with 100 percent reduction at 24,000 to 32,000 µs/cm (Hoffman 2010). These effects would occur at lower thresholds of applied water salinity

depending on initial soil salinity and leaching fractions of the soils, among other things. In 2007, less than ten percent of the crops grown in the ~~southern~~Southern Delta were moderately tolerant or tolerant (Hoffman 2010).

An additional problem associated with applying highly saline water to crops is that salts will eventually have to be flushed from the root zone before yields can be restored. When that occurs, the salts will continue to impair the use of the receiving water as an agricultural supply until such time as all the salts are flushed from channels in the ~~Legal~~ Delta.

Conclusions

Although there will always be water in the Legal Delta channels that are at or below sea~~-~~ level, by ~~August 2021~~July 2022 the quality of the water in those channels would be too salty for agricultural or ~~urban~~municipal beneficial uses absent the releases of previously stored water by the Projects as required by D-1641. This analysis shows that when tidal flux, consumptive use, Delta outflow, the operations of the Projects, and water quality are considered, the assumptions regarding Legal Delta residence time and water quality in the Water Unavailability ~~Analysis~~Methodology are ~~valid~~reasonable.

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