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February 8, 2011

Via U.S. Mail & Via Email:
bay-delta@waterboards.ca.gov
kkylar@waterboards.ca.gov

Ms. Kari Kyler
Division of Water Rights
State Water Resources Control Board
P.O. Box 2000
Sacramento, CA 95812-2000

Re: Nov. 2010 SJR Flow and S. Delta Salinity Response

Dear Ms. Kyler:

On behalf of the County of San Joaquin and the San Joaquin Flood Control and Water Conservation District (collectively hereinafter the "County"), we respectfully submit the following comments in regard to potential modifications to the San Joaquin River flow and southern Delta salinity objectives, including an implementation program to achieve these objectives.

Modification of, and implementation of, the existing or modified objectives has a significant impact on San Joaquin County. The lower San Joaquin River flows through San Joaquin County and the Stanislaus River forms a portion of the southern boundary of the County. Large portions of the County are served both municipal and agricultural water supplies from the Stanislaus and San Joaquin Rivers and the southern Delta. The southern Delta is located entirely within San Joaquin County and the beneficial users which are protected by the southern Delta salinity objectives are all located within the County. As a result, any and all action by the State Water Board regarding these objectives greatly impacts the County.

The County submits as Attachment A to this letter comments regarding a more detailed description of the County and its current condition of groundwater overdraft. In addition, there is an analysis of the potential impacts to agricultural production within the County due to the potential loss of water supply to the County in meeting potential San Joaquin River flows.

In addition, the County supports the comments and concerns submitted by: (1) the South Delta Water Agency related to the southern Delta salinity objectives and the Hoffman

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Report, and (2) the Stockton East Water District related to flows on the Stanislaus River in excess of 1,250-1,500 cfs after February 1st, and the mandates of HR 2828 regarding the Stanislaus River.

If you should have any questions or concerns, please do not hesitate to contact me at (209) 948-8200.

Very truly yours,

A handwritten signature in cursive script, appearing to read "DeAnne M. Gillick", followed by the phrase "on behalf of" written in a smaller, less legible cursive.

DeAnne M. Gillick
Attorney at Law

DMG/ect
Attachment
cc: C. Mel Lytle

Attachment A: Potential Impacts to San Joaquin County if New Melones Reservoir is Used to Meet Proposed San Joaquin River Flow Requirements

Background

San Joaquin County continues to be a leading regional center for agricultural production and food related processing and manufacturing. Based on the U.S. Census Bureau 2007 Economic Census, food manufacturing accounted for over \$3.1 Billion in receipts and sales. The 2009 San Joaquin County Agricultural Commissioner's Report listed San Joaquin County's total agricultural production value at approximately \$2 Billion, just under the all time high of \$2.1 Billion in 2008. The underlying groundwater basin is relied upon heavily to meet the water demands of irrigated agriculture and the needs of urban areas. Figure 1 depicts the agencies overlying the Eastern San Joaquin Groundwater Management Area.

Long-term groundwater overdraft has had dramatic effects on water levels and water quality. Portions of the Basin have seen groundwater levels decline by as much as 2 feet per year up to 90 feet below sea level. Groundwater level declines have induced steep gradients from the west Delta inducing the intrusion of highly saline groundwater into the Basin. Several municipal supply wells in the City of Stockton and irrigation wells have been abandoned due to elevated salt levels unsuitable for drinking and agricultural supplies. The California Department of Water Resources (DWR) has declared the Eastern San Joaquin Groundwater Basin (Basin) "critically overdrafted," indicating that the current rate of groundwater pumping exceeds the rate of recharge and is not sustainable. (DWR, 1980)

Groundwater flow in the Basin now converges on the depression with relatively steep groundwater gradients eastward from the Delta toward the depression East of Stockton. The eastward flow from the Delta area is significant because of the typically poorer quality water now moving eastward in the Stockton area.

Degradation of water quality due to saline migration threatens the long-term sustainability of underlying basin. Salt laden groundwater is unusable for either urban drinking water needs or for irrigating crops. The saline intrusion problem is not well understood by the Authority. Limited studies and monitoring have produced postulates as to the sources and extent of the saline front. Figure 2 illustrates the approximate location of the 300 mg/L isochlor as measured in 2000. Projections indicate that the rate of eastward migration of the saline front is approximately 150 to 250 feet per year. Figure 2 also shows the projected 2030 location of the 300 mg/L isochlor under no-action conditions.

Water from Stanislaus River has been relied upon by San Joaquin County water users for over 100-years. SSJID and OID have pre-1914 rights which are recognized contractually by the Bureau of Reclamation for up to 600,000 acre-feet per year from New Melones Reservoir.

The SSJID is located wholly within San Joaquin County with portion only a portion of OID within the County-line. Water available to SSJID and OID from the Stanislaus River is used primarily for irrigated agriculture within their respective service areas. Up to 320,000 acre-feet of water is available to SSJID and the San Joaquin County portion of OID from New Melones. SSJID also provides approximately

44,000 acre-feet per year of treated surface water for potable uses in the Cities of Lathrop, Manteca, and Tracy. SSJID is scheduled to begin treated water deliveries to the City of Escalon in 2012.

Additionally, the SEWD and CSJWCD have existing contracts with the Bureau of Reclamation for up to 155,000 Acre-feet per year which includes a firm delivery of 49,000 acre-feet per year to the CSJWCD. Under the Interim Plan of Operations for New Melones, which is currently being implemented by the Bureau of Reclamation, SEWD and CSJWCD receive far less than the face value of their contract. A portion of the New Melones water supply was also intended to be delivered to the City of Stockton Metropolitan Area¹ (COSMA) to offset groundwater pumping. The COSMA currently receives approximately 20,000 acre-feet per year of potable from the New Melones Project which is treated by SEWD.

Analysis of Water Supply Lost to San Joaquin County

The following analysis was prepared to demonstrate how the loss of New Melones water could affect the agricultural production in Eastern San Joaquin County. Commodities acreages were extracted from the 2010 San Joaquin County Agricultural Commissioner's Office Geographical Information Systems Database. Commodity unit values were obtained from the 2009 San Joaquin County Agricultural Report. The total estimated value of crops grown in areas receiving New Melones Water is \$842,615,940 (See Tables Below).

Irrigated Acreage and Crop Value by Area Receiving Water from the New Melones Project		
	Irrigated Acreage	Total Value
CSJWCD	66,781	\$ 265,605,816
OID	9,114	\$ 19,364,153
SEWD	145,513	\$ 340,360,627
SSJID	72,532	\$ 175,626,565
Unorganized Areas	20,818	\$ 41,658,778
Total	314,758	\$ 842,615,940

¹ The COSMA consists of the City of Stockton, California Water Service - Stockton, Lincoln Village, and Colonial Heights water service areas.

Top Ten (10) Crops Based on Reported Acreage**	
WALNUT	37,776
ALMOND	37,401
CORN FOR/FOD	19,363
CHERRIES	12,724
WHEAT	12,093
WINE GRAPE	11,502
OAT FOR/FOD	11,182
ALFALFA	6,814
TOMATO PROCESS	4,991
OAT	4,741

Top Ten (10) Crops Based on Estimated Value**	
CHERRIES	\$ 151,562,082
DAIRY	\$ 145,626,903
WALNUT	\$ 124,464,929
ALMOND	\$ 105,156,399
TOMATO	\$ 38,037,885
WINE GRAPE	\$ 35,759,923
APPLE	\$ 30,498,705
CORN FOR/FOD	\$ 17,787,442
TOMATO PROCESS	\$ 15,141,419
ONION DRY	\$ 14,626,384

Since the magnitude of actual water deliveries to be seized in the implementation of recommended flow increases to up to 60% of natural flow is unknown, a conservative estimate of 60% reduction of water supplies from New Melones could drastically reduce the value of irrigated agriculture in Eastern San Joaquin County and send a catastrophic ripple effect throughout the manufacturing and processing related industries which contribute substantially to the San Joaquin County community.

An addition impact of reduced New Melones Flow is the need to replace lost surface water supplies and the marginal cost of declining groundwater levels. Assuming that the water supply contract between the Bureau of Reclamation and CSJWCD is not honored the resulting loss of 155,000 acre-feet per year to the underlying basin is estimated at over \$24.4 million annually. The calculation is based on a net pumping of 45,000 acre-feet per year within in the City of Stockton, 452,586 acre-feet per year in SEWD and CSWCD due to the loss of New Melones supplies, a specific yield of 7.3%, a combined acreage of 212,294 acres within the COSMA, SEWD, and CSJWCD, a factor of 1.46 KW-hours per foot of lift per acre-foot, and a \$0.11 per KW-hour. Additional impacts to groundwater quality are also expected to be exacerbated due to increases in the rated of saline groundwater migration closer to municipal wells located in the COSMA

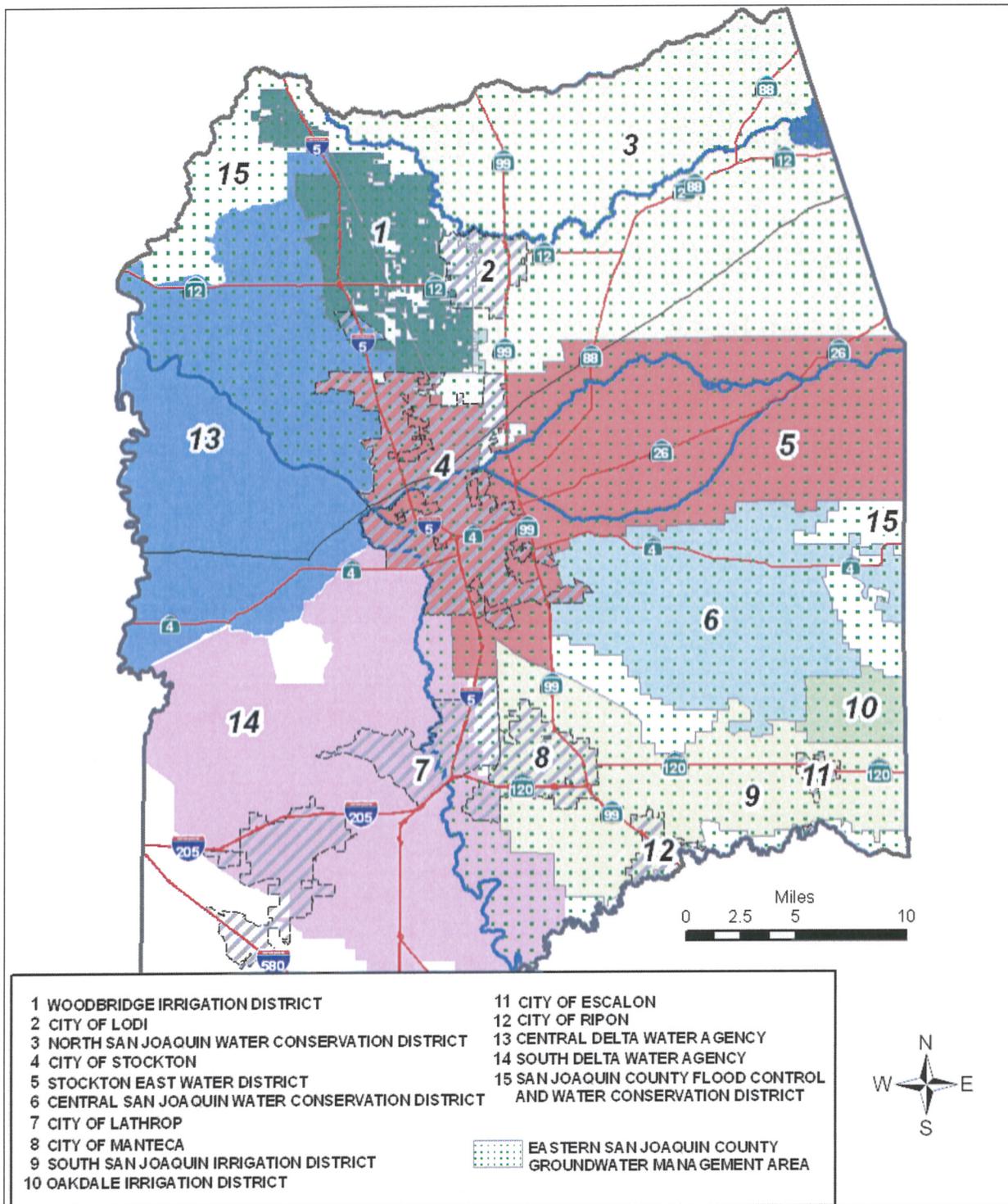


Figure 1 Overlying Agencies within the Groundwater Management Area

Source: California Spatial Information Library at <http://www.gis.ca.gov/>

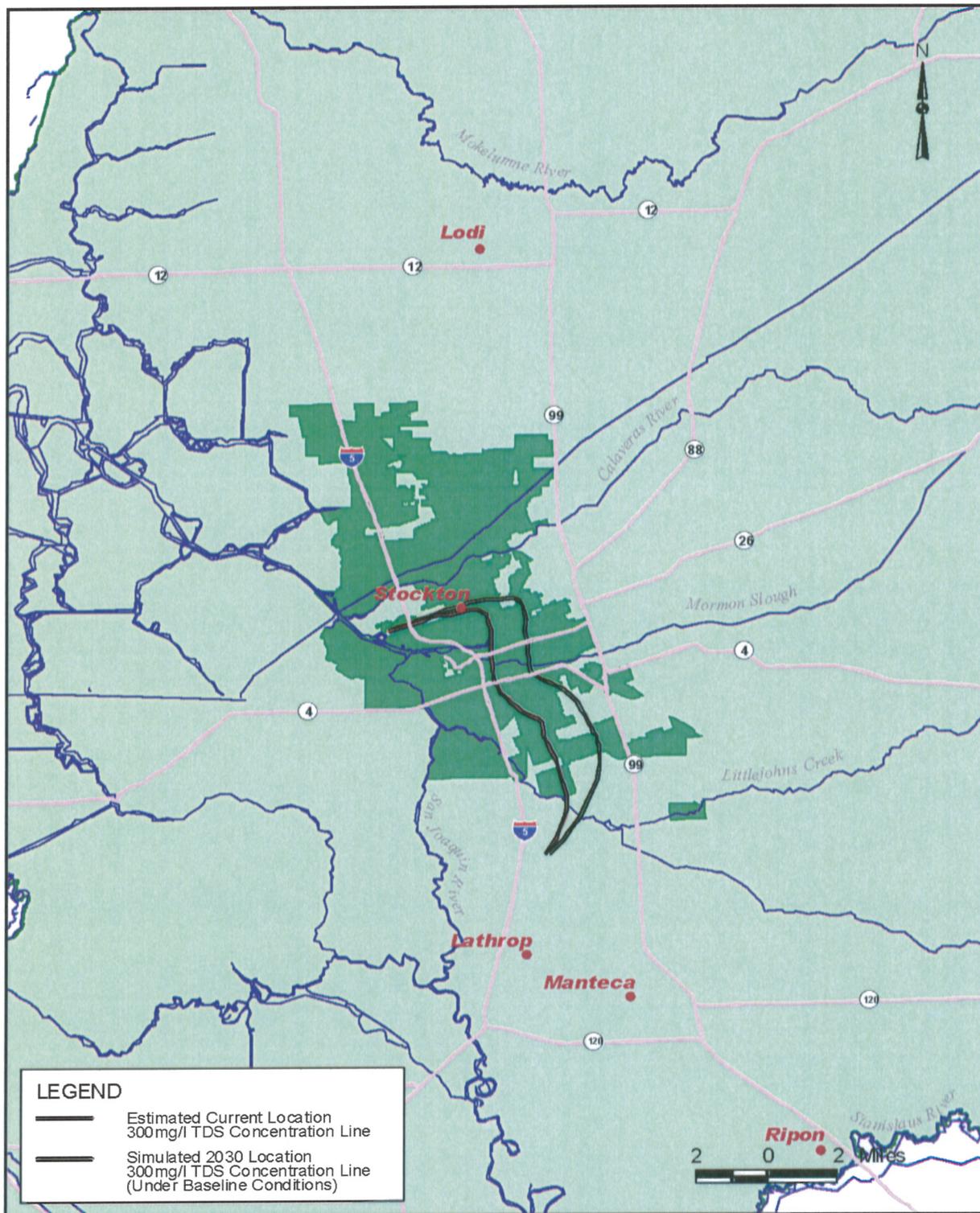


Figure 2 Estimated 2000 and Projected 2030 Saline Front

Source: Camp Dresser & McKee, Inc.