STATEMENT OF THE CENTRAL DELTA WATER AGENCY ON THE DRAFT WATER QUALITY CONTROL PLAN AND THE DRAFT ENVIRONMENTAL REPORT FOR THE WATER QUALITY CONTROL PLAN FOR SAN FRANCISCO BAY/SACRAMENTO-SAN JOAQUIN DELTA ESTUARY (DECEMBER 1994)

FEBRUARY 23, 1995

The Central Delta Water Agency's primary focus is on maintaining a water supply suitable both in terms of quality and quantity on the lands adjacent to the channels with the Central Delta. These lands are used mainly for agriculture now, although wildlife habitat and recreational uses are important and growing in significance. The creation and activities of the Delta Protection Commission have added emphasis to preservation and enhancement of agricultural, recreation and habitat uses of the Central Delta lands and waterways.

This iteration of a water quality control plan has been focussed on arresting the dramatic decline of aquatic populations that depend upon the Bay-Delta Estuary, several of which are threatened with extinction. Agricultural issues have not been revisited; nor have recreational or land-based habitat uses been re-examined, other than by inference. Although the current concentration on aquatic populations is understandable, we urge you not to abandon direct concern for protection of agricultural, recreational and land-based habitat uses in your future deliberations.

Agricultural Needs:

The agricultural standards brought forward from D-1485 into this Draft Plan are restricted to the period from April 1 to August 15. Although most irrigation occurs during this period, water is diverted from the channels onto lands in the Central Delta for critical agricultural uses in every month of the year. Some crops are still being irrigated into the fall, and pre-irrigation of crops can begin as early as January, February or March, particularly after a dry winter. Leaching of salts accumulated by previous evapo-transpiration of crops and native vegetation requires water diversion and application in the fall and winter months.

Although the water quality needs for irrigation and leaching after August 15 and before April 1 can be (and usually are) met by water quality standards designed to protect other uses (such as fishery and export quality needs), explicit recognition of the water quality needs of agriculture on a year-round regimen should eventually be reflected in agricultural water quality standards for every month.

A particular concern to us are the potential impacts of Delta Cross-Channel closures and increased San Joaquin River flows on water quality in the Central Delta. It is likely that these actions in combination will result in San Joaquin River water quality, which is grossly impacted by San Joaquin Valley drainage, adversely impacting water quality in some channels of the Central Delta. When we inquired during the Workshop sessions, we were advised that the operation studies conducted to test the different Bay-Delta Plan scenarios under consideration did not include resulting water quality at measuring stations within the Central Delta.

We do not believe the Draft Environmental Report or your deliberations on this Draft Plan can be complete without such information for all months. We are particularly concerned by the following statement which appears at page VI-2 of the Draft Environmental Report:

> "7. DWRSIM is not capable of analyzing the water supply impacts of water quality objectives for the interior stations in the southern Delta because of a lack of adequate understanding of relationships between the San Joaquin River flow and Southern Delta water quality."

Because the San Joaquin River water quality could have a growing impact on water quality in the Central Delta with Cross-Channel closures and increased San Joaquin River flows, greater inquiry needs to be made about the sources of San Joaquin River water that will be flowing into the Delta.

The only measuring station currently provided in the Draft Plan is below the confluence of the Stanislaus River with the San Joaquin, and the assumption appears to be that increased flows for the San Joaquin River will all be provided from New Melones Reservoir via the Stanislaus River. Such water would be of excellent quality, but the Draft Environmental Report indicated that there will not always be enough water in New Melones to meet the San Joaquin River flow requirements. In addition, there are legal and equitable demands upon waters stored in New Melones which may restrict usage of waters stored in New Melones to other purposes.

In anticipation of these problems, a water quality measuring station should be established on the San Joaquin River above its confluence with the Stanislaus so that the flow and water quality implications of water from sources other than the Stanislaus River can be anticipated and understood before problems arise. Without construction of the "valley drain" which was to be a pre-requisite to contracting for water from the San Luis Unit of the CVP, the CVP water evaporated from the Delta will continue to add to the salt load at Vernalis. If CVP exports for delivery into the portion of the Central Valley which drains to the San

Joaquin River are allowed to continue then an appropriate contribution of water from San Luis or Friant should be required for dilution of the salts added to the San Joaquin. Under the Delta Protection Act, exports must be limited to water which is surplus to the needs of the Delta. To the extent non-regulated as well as regulated flows are needed to flush salts out of the Delta, including those salts contributed by way of the San Joaquin River, they are not surplus and should not be subject to export.

We have some additional brief comments on the Draft Water Quality Plan and the Draft Environmental Report:

1. Fish Screens: We support the approach to fish screening incorporated in these documents. The implications of location, timing and methodology need to be much better understood before what could otherwise be an extremely expensive, disruptive and ineffectual construction program is started.

2. Alternative Water Conveyance: We support the Draft Plan's approach of looking at "various alternative," especially in view of the increased outflow the Draft Plan provides. Keeping the primary nursery areas well west of the export pumps should reduce the impact of the export pumps on the eggs, larvae and smaller fish that are hardest to screen, and will probably eliminate "carriage water" needs. Incremental solutions short of an isolated transfer facility should be the most effective means of dampening the impacts of water conveyance facilities. Isolated transfer facilities would in our view violate the common pool concept which is at the heart of the Delta Protection Act.

3. Water Conservation: Delta levee maintenance is critical to fresh water conservation in the Delta. Previous and current studies show that evaporation from flooded surfaces in the Delta "uses" approximately two acre feet per flooded acre more than if the same acre was farmed. On farmed lands, all un-consumed water is returned to the usable supply. The inescapable conclusion is that the levees in the Delta need to be maintained to prevent flooding of the 600,000 acres now farmed in the Delta and conserve over 1.2 million acre feet of fresh water that would otherwise be lost through evaporation from flooded surfaces.

We thank you for the opportunity to present our views on these important subjects.