256

## STATEMENT OF SAN JOAQUIN COUNTY BEFORE THE STATE WATER RESOURCES CONTROL BOARD HEARINGS ON THE WATER QUALITY REQUIREMENTS FOR THE BAY-DELTA ESTUARY

San Joaquin County recognizes and appreciates the work of the State Water Resources Control Board and others to develop water quality standards for the Bay-Delta estuary. As a significant portion of the San Joaquin-Sacramento Delta lies in the County and many County residents use its waters for consumptive and recreational purposes, we understand the need to balance diverse interests when protecting this valuable resource.

There exists, however, a significant aspect of the proposed standards that does not provide for a fair balance. Specifically, the County is very concerned with the establishment of only one water quality measuring point on the San Joaquin River. The location of this water quality measuring point at Vernalis, below the San Joaquin's confluence with the Stanislaus, and the exclusion of other measuring points, unfairly places the entire burden of meeting San Joaquin River water quality requirements on the Stanislaus and does not fairly allocate that burden to other tributaries of the San Joaquin.

As you know, San Joaquin County has a critically overdrafted groundwater basin in the eastern portion of the County. We are in need of supplemental surface water to combat this overdraft. The Stockton East Water District has a contract with the U.S. Bureau of Reclamation for a supplemental surface water supply from New Melones, but Stockton East has yet to receive a single drop of

water under this contract. The Central San Joaquin Irrigation District also has not received any water under its Bureau contract. The two years in which the Stockton East Water District has had the facilities in place to accept water from New Melones the Bureau has determined that all project yield was needed to meet downstream water quality and Fish & Wildlife requirements in the San Joaquin and Delta. In fact, the Bureau allocated 200,000 acre-feet of the 800,000 acre-feet prescription under the Central Valley Project Improvement Act to the Stanislaus River, an unfair and unjustified act.

Even before the Central Valley Project Improvement Act the Bureau of Reclamation has used releases from New Melones Reservoir to meet its Delta water quality obligations. The San Joaquin River has become the drain for the Bureau's water deliveries to the west side of the Valley.

As you are well aware, the facility to convey away drainage water from lands irrigated on the west side of the Valley with water provided by the Bureau of Reclamation was to be part of the Central Valley Project. This west side drain has not been fully completed. As a result, the salts and other materials present in the drainage water drains into the San Joaquin River. In other words, the San Joaquin River has become the drain for the Bureau's deliveries to the west side of the Valley. The Bureau has used releases from New Melones Reservoir to dilute the salts so that Delta water quality standards are met. Despite knowing about this problem, the Bureau has continued to deliver water to the west side

standards should be established for the Merced measuring point. Contributions of water from the Friant Service Area, San Luis Reservoir and other alternatives should be considered in addressing water quality and flows in the San Joaquin River.

Again, the County commends the State Board and others for tackling one of the State's most pressing and contentious issues, water quality standards in the Bay and the Delta. The County supports the barriers used to improve water quality that are already in the plan and proposed by the South Delta Water Agency. However, the Board must be sensitive to the fact that the Stanislaus River has historically borne the brunt of meeting these standards and that by only placing one measuring point on the San Joaquin, below its confluence with the Stanislaus, encourages this We hope that the Board will establish a activity to continue. second measuring point on the San Joaquin below the Merced and address the issue of drainage from lands on the west side of the Valley that currently are leaching salts into the San Joaquin. believe that these measures will help improve conditions in the San Joaquin and Delta and will help the residents of this County.