

M e m o r a n d u m

Date : June 19, 2009

To : Ms. Dorothy Rice
Executive Director
State Water Resources Control Board
1001 I Street
Sacramento, California 95814

From : Department of Water Resources

Subject : Report of Potential Exceedance of South Delta Water Quality Objectives

This letter is written pursuant to Condition A.4 of the State Water Resource Control Board's (SWRCB) Order WR-2006-0006 (Order) to the Department of Water Resources (DWR) and the United States Bureau of Reclamation (USBR) and is to advise the SWRCB of a potential exceedance of the south Delta water quality objective at Station P-12.

Condition A.4 requires DWR and/or USBR to inform the SWRCB of a potential exceedance of the 0.7 EC South Delta Water Quality Objective at Interagency Stations C-6 (San Joaquin River at Brandt Bridge), C-8 (Old River near Middle River), and P-12 (Old River at Tracy Road Bridge), prior to July 1, 2009.

The June 1, 2009 Quarterly Report that was sent to you (part of the reporting requirements in the Order) states that "The Department is not projecting any further exceedances of south Delta objectives for June through August..." This conclusion was based on modeling (DSM2) projections of south Delta water quality. The report, however, also notes on Page 2 that "These modeling projections do not account for any salinity degradation which may occur downstream of Vernalis and include simplifying assumptions regarding local discharges within the south Delta".

The attached table (Attachment 1) shows both the mean daily EC at each station and the corresponding 30 day running average at all three stations since May 1, 2009. In our May 28, 2009 exceedance letter, we noted that the 0.7 EC objective has been met at all three stations since May 6, 2009. However, on or about May 24, daily water quality, particularly at Station P-12, has begun to steadily degrade as shown by the increasing salinity values in Attachment 1.

DWR wishes to emphasize two key points here. First, combined State Water Project/Central Valley Project exports at Banks and Jones Pumping Plants have been very low over the last two months, averaging 2026 cfs for the entire month of May and

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1529 cfs to date in June. The low export rates have occurred due to a combination of extremely dry conditions in the watershed and export restrictions imposed to protect San Joaquin River salmon and delta smelt. Therefore, high export pumping rates are not attributable causes to the current water quality degradation that is being experienced at Station P-12.

Second, and perhaps more importantly, the daily salinity at Station C-10 (San Joaquin River at Airport Way Bridge, Vernalis) has been running at approximately the 0.5 EC range in mid-June, well below the standard of 0.7 EC at this location. In spite of daily EC's at Vernalis in the 0.5 EC range, the corresponding daily EC at Station P-12 (Old River near Tracy Road Bridge) is running at approximately 0.8 EC. Thus, there is a salinity degradation from Vernalis to Tracy Road Bridge of approximately 0.3 EC that is not attributable to Vernalis water quality or water project pumping operations.

DWR and Reclamation have provided extensive evidence in the past of the significant salinity degradation that occurs in the south Delta that is beyond the control of, and not attributable to, water project operations. The "real-time" situation that is occurring now provides further and, we believe, conclusive evidence that our concerns are well-founded and reasonable. We sincerely hope the SWRCB and its staff will take this into consideration in future hearings and proceedings related to the appropriateness of current and proposed south Delta water quality objectives and responsibility for implementation of such objectives.

Condition A.4 also requires DWR and USBR to describe any corrective actions they are initiating to avoid the exceedance. There are three actions planned which may help improve south Delta water quality conditions this summer.

Consultation with the U.S. Fish and Wildlife Service on the construction and removal of temporary agricultural barriers for 2009 was only recently concluded. Construction of the barriers began in late May. The Middle River barrier has been completed and it is anticipated that the Old River and Grant Line Canal barriers will be completed and fully operational by June 25, 2009. As we have done in the last two years, the flap gates at the Old River near Tracy barrier will be periodically tied open during the summer to provide additional water quality benefits.

DWR has also applied to the U.S. Army Corps of Engineers and the Department of Fish and Game for a permit modification to allow DWR to raise the weir height of the

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Middle River barrier by one foot. Modeling has shown that in combination with tying open culverts at the Old River near Tracy barrier, this modification can improve water circulation and water quality in Old River. DWR hopes to make this modification later this summer after receiving regulatory agency approval.

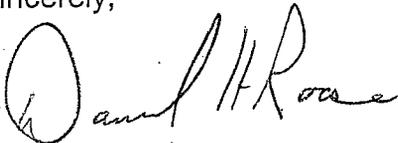
Lastly, up to 60,000 acre-feet of water is being planned for transfer from the San Joaquin River (primarily from the Stanislaus River) to south of Delta exporters during this summer. The increased flow at Vernalis that would occur as a result of the transfers may help improve south Delta water quality conditions.

Although these actions should benefit salinity conditions, it is highly unlikely that these efforts will be sufficient to avoid exceedances of the 0.7 EC objective given the level of observed degradation.

Other than these actions, no further corrective actions are being contemplated by DWR and/or USBR.

If you have any questions, please contact me at (916) 574-2656 or your staff may contact Mike Ford at (916) 574-2654.

Sincerely,

A handwritten signature in cursive script that reads "David H. Roose". The signature is written in black ink and is positioned above the typed name and title.

David H. Roose, Chief
SWP Operations Control Office
Division of Operations and Maintenance

Attachments

cc: (See distribution list.)

Distribution List:

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Paul Fujitani, USBR
Jeff Sandberg, USBR
Amy Aufdemberge USBR

PROOF OF SERVICE

I, the undersigned, hereby certify that I am over the age of eighteen (18) years of age and an employee of the State of California Department of Water Resources, 1416 Ninth Street, Sacramento, California 95814

On June 19, 2009, I served true and correct copies of the attached letter to the persons listed on the cc list.

A handwritten signature in cursive script, appearing to read "E. Masch".

Date: June 19, 2009

Delta Water Quality Conditions

South Delta Stations

Date	Vernalis		Brandt Bridge		Old River Near Tracy		Old River Near Mid	
ST Date	VERec	VER30ec	BDTec	BDT30ec	OLDec	OLD30ec	UNDec	UNI30ec
01-May-09	0.30	0.5	0.36	0.6	0.59	0.8	0.36	0.7
02-May-09	0.32	0.5	0.35	0.6	0.60	0.8	0.36	0.7
03-May-09	0.33	0.5	0.35	0.6	0.58	0.8	0.38	0.6
04-May-09	0.34	0.5	0.37	0.6	0.58	0.8	0.40	0.6
05-May-09	0.34	0.5	0.38	0.6	0.57	0.8	0.41	0.6
06-May-09	0.32	0.5	0.39	0.5	0.56	0.7	0.41	0.6
07-May-09	0.32	0.4	0.39	0.5	0.54	0.7	0.39	0.6
08-May-09	0.32	0.4	0.37	0.5	0.52	0.7	0.38	0.5
09-May-09	0.32	0.4	0.36	0.5	0.50	0.7	0.37	0.5
10-May-09	0.30	0.4	0.36	0.5	0.49	0.7	0.39	0.5
11-May-09	0.27	0.4	0.36	0.5	0.49	0.7	0.36	0.5
12-May-09	0.26	0.4	0.33	0.5	0.50	0.6	0.33	0.5
13-May-09	0.26	0.4	0.30	0.4	0.46	0.6	0.31	0.5
14-May-09	0.25	0.4	0.30	0.4	0.45	0.6	0.31	0.4
15-May-09	0.26	0.3	0.30	0.4	0.43	0.6	0.31	0.4
16-May-09	0.26	0.3	0.30	0.4	0.46	0.6	0.32	0.4
17-May-09	0.27	0.3	0.31	0.4	0.47	0.6	0.33	0.4
18-May-09	0.28	0.3	0.32	0.4	0.50	0.6	0.33	0.4
19-May-09	0.29	0.3	0.32	0.4	0.50	0.6	0.34	0.4
20-May-09	0.28	0.3	0.32	0.4	0.52	0.5	0.34	0.4
21-May-09	0.26	0.3	0.33	0.4	0.48	0.5	0.36	0.4
22-May-09	0.27	0.3	0.34	0.4	0.48	0.5	0.33	0.4
23-May-09	0.29	0.3	0.33	0.3	0.49	0.5	0.33	0.4
24-May-09	0.30	0.3	0.32	0.3	0.50	0.5	0.34	0.4
25-May-09	0.32	0.3	0.32	0.3	0.57	0.5	0.37	0.4
26-May-09	0.31	0.3	0.33	0.3	0.61	0.5	0.39	0.4
27-May-09	0.32	0.3	0.35	0.3	0.56	0.5	0.42	0.4
28-May-09	0.34	0.3	0.36	0.3	0.61	0.5	0.41	0.4
29-May-09	0.34	0.3	0.38	0.3	0.68	0.5	0.42	0.4
30-May-09	0.35	0.3	0.39	0.3	0.59	0.5	0.44	0.4
31-May-09	0.34	0.3	0.40	0.3	0.60	0.5	0.44	0.4
01-Jun-09	0.34	0.3	0.41	0.3	0.61	0.5	0.44	0.4
02-Jun-09	0.36	0.3	0.42	0.3	0.62	0.5	0.44	0.4
03-Jun-09	0.38	0.3	0.42	0.4	0.61	0.5	0.44	0.4
04-Jun-09	0.42	0.3	0.43	0.4	0.64	0.5	0.46	0.4
05-Jun-09	0.43	0.3	0.43	0.4	0.69	0.5	0.47	0.4
06-Jun-09	0.46	0.3	0.44	0.4	0.71	0.5	0.52	0.4
07-Jun-09	0.45	0.3	0.45	0.4	0.74	0.6	0.55	0.4
08-Jun-09	0.45	0.3	0.47	0.4	0.77	0.6	0.58	0.4
09-Jun-09	0.45	0.3	0.51	0.4	0.76	0.6	0.57	0.4
10-Jun-09	0.46	0.3	0.53	0.4	0.73	0.6	0.55	0.4
11-Jun-09	0.47	0.3	0.54	0.4	0.74	0.6	0.58	0.4
12-Jun-09	0.48	0.4	0.54	0.4	0.75	0.6	0.58	0.4
13-Jun-09	0.49	0.4	0.55	0.4	0.77	0.6	0.60	0.4
14-Jun-09	0.49	0.4	0.56	0.4	0.81	0.6	0.61	0.4

15-Jun-09	0.52	0.4	0.57	0.4	0.82	0.6	0.64	0.5
16-Jun-09	0.55	0.4	0.59	0.4	0.87	0.6	0.64	0.5
17-Jun-09	0.56	0.4	0.60	0.4	0.88	0.7	0.64	0.5
18-Jun-09	0.56	0.4	0.60	0.4	0.85	0.7	0.68	0.5