

**STATEMENT OF JACK ALVAREZ IN SUPPORT OF
SOUTH DELTA WATER AGENCY'S OPPOSITION TO
THE SED's PROPOSED CHANGES TO THE SOUTHERN DELTA
WATER QUALITY OBJECTIVES FOR THE PROTECTION OF
AGRICULTURAL BENEFICIAL USES**

My name is Jack Alvarez. I am a Board member of the South Delta Water Agency and a Board member of the West Side Irrigation District (WSID). The latter is currently in the process of merging with the Byron Bethany Irrigation District.

I have been farming in the southern Delta for 35 years at various locations. My family has been farming in this area for 85 years. Over the years, we have and continue to grow a number of crops including alfalfa, cannery tomatoes and lima beans and others.

From my position as Board member of SDWA and WSID, I am regularly briefed on southern Delta water quality and am aware that the current standards to protect agriculture beneficial uses are 0.7 EC from April through August and 1.0EC from September through March. Both of these standards are regularly exceeded but the SWRCB for some reason has made no effort to enforce them.

I am also aware that the SED being discussed at this hearing proposes to relax the standards to 1.0 EC year round. I also understand that the proposed implementation of this new standard seeks to maintain the 0.7 EC at Vernalis (from April through August) in an attempt to maintain current conditions in the southern Delta hoping that this will mean the new standards do not result in any further deterioration of the current conditions.

The purpose of my statement is to challenge the underlying assumption of the SED that the current conditions are protective of agricultural beneficial uses in the southern Delta. That assumption is demonstratively incorrect.

I farm lands within WSID which receive water from Old River from an intake which is upstream of the Tracy Old River temporary rock barrier site. I also farm lands within Banta-Carbona Irrigation District which for the most part receive water from the San Joaquin River, just downstream of Vernalis. The Old River water is of worse quality than the San Joaquin River water. Based on my personal knowledge and records, my crop yields for cannery tomatoes and lima beans are clearly lower on my lands irrigated with Old River water than those irrigated with the San Joaquin water (from the BCID diversion site).

Any comparison of crop yields is difficult given that no two locations can have the exact same conditions. However, my lands are of similar soil types and I practice the same management practices. I believe it is clear that the difference in supply water quality is the only major difference between the two lands and therefore conclude that the current water quality conditions in the southern Delta are not protecting agriculture.

I am aware of no efforts by the SWRCB to actually investigate salinity impacts to agricultural in the southern Delta other than the report it relies upon to support the SED (with regard to the salinity standards) authored Dr. Hoffman. As being explained by SDWA's counsel Mr. Herrick, Mr. Hoffman apparently used tile drainage data in his leaching calculations derived from tiles drains in areas in and around the WSID service area. I am personally aware of the drains from which this data came. These drains mostly intercept poor quality groundwater. They do not solely intercept excess applied water. Hence, if Dr. Hoffman believed the tile drain data was an indication of salts leaching out of the root zone he made a serious mistake. The tile drain data is an indication of the ground water quality; it is not an indication of the salts leaching through the overlying root zones.

I and certainly almost every other southern Delta farmer believe that the current water quality conditions in the southern Delta are regularly detrimental to our crops. We strongly oppose any relaxation of these standards, especially the 0.7 EC standard from April through August. We also believe the SWRCB should enforce the current standards.

JACK ALVAREZ