

West Stanislaus Irrigation District

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Robert H. Schneider
Central Valley Regional Water Board
11020 Sun Center Drive #200
Rancho Cordova, CA 95670

Re: Salinity Objectives and Total Maximum Daily Load Upstream for the Lower San Joaquin River Upstream of Vernalis.

Dear Chairman Schneider:

While the Central Valley Regional Water Quality Control Board is considering the adoption of water quality objectives for salinity on the San Joaquin River upstream of Vernalis, it should consider the views of those who actually divert water from that part of the river for irrigation. The West Stanislaus Irrigation District currently diverts water from the San Joaquin River between Mendota Pool and Vernalis pursuant to License Number 3957 (Application 1987), irrigates approximately 21,666 acres with this water, and grows a variety of crops, including alfalfa, almonds, apricots, beans, and tomatoes. The West Stanislaus Irrigation District also diverts water from the Delta Mendota Canal, pursuant to contract 14-06-200-1072-LTR.

The West Stanislaus Irrigation District is committed to maintaining and protecting the quality of water in the San Joaquin River. With the exception of Dry and Critically Dry year types, the salinity of the water we divert is sufficiently low to irrigate crops in our service area without adverse consequences. Water quality objectives for salinity are not necessary to protect agricultural beneficial uses in the West Stanislaus Irrigation District. If the salinity of San Joaquin River water were a serious problem, the farmers in the West Stanislaus Irrigation District would have stopped growing crops long ago.

Implementing salinity objectives will require discharge controls that will reduce return flows during low-flow periods, and, as a result, reduce flows in the San Joaquin River. Since flows are lowest at the peak of the irrigation season, a total maximum daily load would reduce flow when flow is most necessary for our farmers. Much of the water the West Stanislaus Irrigation District diverts, especially in the summer irrigation season, consists of return flows from upstream irrigation and water districts, many of which divert water from the Delta Mendota Canal, but discharge their tailwater into the river. This water may have been used multiple times before reaching the West Stanislaus Irrigation District's diversion. If a total maximum daily load requiring retention of drainage is implemented, then only groundwater accretions, with salt concentrations higher than that of the water the West Stanislaus Irrigation District currently diverts, would remain. The West Stanislaus Irrigation District prefers the present flow and water quality, to improved water quality and either less flow or no flow at all. Improved water quality would not help us, but lower flows would cripple our farming operations.

Total maximum daily loads will not solve the salt problem. Half a million to a million tons of salt still come into the San Joaquin River Basin through the Delta Mendota Canal, the United States Bureau of Reclamation has not built a drain, and the State lacks the resolve to do the right thing. Instead, the State, through adoption of a total maximum daily load, will destroy agriculture with crippling regulatory controls and costs and by allowing salts to continue accumulating in the soil, all while ignoring the real problem.

Thank you for your attention on this matter. We look forward to discussing this matter with you further.

Best Regards,

WEST STANISLAUS IRRIGATION DISTRICT

By:



Ronald Roos
General Manager