

THE CENTRAL SAN JOAQUIN WATER CONSERVATION DISTRICT

"67,000 acres of diversified family farms in San Joaquin County, California"
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March 16, 2017

VIA EMAIL commentletters@waterboards.ca.gov

Public Comment
2016 Bay-Delta Plan Amendment & SED
Deadline: 3/17/17 12:00 noon

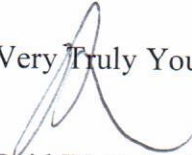
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100



Dear State Water Resources Control Board:

Enclosed please find Central San Joaquin Water Conservation District's comments regarding the Substitute Environmental Document.

Very Truly Yours,


Reid W. Roberts, Secretary
Central San Joaquin Water
Conservation District

**CENTRAL SAN JOAQUIN WATER CONSERVATION
DISTRICT'S COMMENTS ON THE
SUBSTITUTE ENVIRONMENTAL DOCUMENT**

March 15, 2017

Central San Joaquin Water Conservation District submits the following comments on the SED.

CSJWCD Background:

The Central San Joaquin Water Conservation District (District) was formed in 1958 under the provisions of the Water Conservation District Act of 1931, for the purpose of conserving sources of water within the District, securing supplemental sources of water, and ensuring that sufficient amounts of water would be available to all users in the District in order to address the existing and on-going critically overdrafted conditions of the basin underlying the District.

The District is located in Southeast San Joaquin County and overlies a portion of the Eastern San Joaquin Groundwater Subbasin. There are approximately 71,888 acres within the District. The District is fully developed with irrigated agricultural land of approximately 58,000 acres (81% of the District). In addition, the District is comprised of a small number of domestic users and a limited number of commercial livestock enterprises.

CSJWCD Purpose:

District legislation states "the provisions of this act are necessary because of special circumstances with the Central San Joaquin Water Conservation District. The district faces serious and unique problems arising from the depleted groundwater basin within the district. The district has been required to incur unusual and substantial expenses for the protection and augmentation of the water supplies of the district and the charges authorized to be collected pursuant to this act are necessary to equitably finance those activities of the district." California Water Code Section 75470.

In 1980, the California Department of Water Resource (DWR) declared that the Eastern San Joaquin Groundwater Basin was "critically overdrafted" and recited the need to develop facilities and use surface water to stabilize the basin. The Brown and Caldwell 1985 Eastern San Joaquin Groundwater Study indicates groundwater levels within the District had been dropping at an average rate of 1.8 feet annually during the preceding 50 years.

The District was formed for the purpose of obtaining surface water from the then planned Folsom South Canal that would supply surface water stored in Auburn Dam. Securing surface water from Folsom South Canal was intended to address the issue of overdraft and thus sustainability of the groundwater basin as a long-term source of water supply for the District's customers. Although a service water contract was executed by the District and US Bureau of Reclamation (USBR), supplemental surface water was not supplied as the Federal Project (Auburn Dam) was cancelled.

CSJWCD Project:

In the later 1970's, the District pursued a contract with the Bureau of Reclamation for the New Melones Project. In 1981, the District was given a priority water service contract. The contract was executed by the District in 1983, with the Bureau, for water service from the New Melones Project on the Stanislaus River. This contract called for a firm supply of 49,000 acre-feet (AF) and additional supply of up to 31,000 AF on an interim basis to the District.

In 1993, the District issued certificates of participation in excess of \$7,000,000 for construction of an internal distribution system within District boundaries for the delivery of the contracted surface water. This funding and the construction of these facilities to help stabilize the basin was made possible by the District's establishment of a groundwater charge. Facilities constructed included check dams and structures on both natural channels and conveyance channels with associated pump stations for the delivery of water throughout the District's service area. The District's policy has been to encourage the installation and operation of facilities by individual farmers for their utilization of surface water, with the District maintaining the check dams, conveyance channels, and three distribution system pump stations.

CSJWCD Water Deliveries:

Since 1995, the District has conveyed up to 40,000 acre feet of surface water, annually, from New Melones Reservoir and the Stanislaus River to its service area for District wide irrigation. The use of this supplemental surface water has enabled District farmers to reduce groundwater pumping and thereby preserve the underground aquifer. This in-lieu recharge coupled with direct recharge through the conveyance of the supplemental surface water in unlined District channels has significantly contributed to a replenishment of the aquifer. Such result is documented in the annual groundwater report prepared for the District which sets forth groundwater conditions relative to irrigation providing in-lieu and direct recharge.

CSJWCD Position on the SED

The District opposes any modification to the operation of New Melones Dam resulting in additional releases from New Melones reservoir as set forth in the Substitute Environmental Document. Significant releases have been, and are currently in place, for in river flows. Increase of such releases will result in less or no surface water available to be diverted from the Stanislaus to the District. Satisfaction of the District's water supply contract will be jeopardized if not completely unsatisfied by modification to surface water flows. The District's conveyance system may go completely unused with no water or little water supply. Financial investment undertaken by the District will be seriously impacted, if not completely lost, as a result of the proposed modifications. The District's past efforts and attempts to address over-draft conditions will be squandered. What will remain is the District debt service which will continue to require the establishment and collection of groundwater charges on area farmers while having no surface water to deliver to them.

As required by law, the District is moving forward with formation of a Groundwater Sustainability Agency and Plan. As there is no other surface water available to the District, surface water from the Stanislaus is the center-piece of any Groundwater Sustainability Plan to address the District's over-drafted groundwater aquifer. Should the modifications of the SED be accepted and implemented the District will have no surface water to implement a sustainability plan and will be in a position of requiring groundwater pumps to be shut off thereby fallowing many acres of District farmland.

The State of California has designated a portion of the District as a Disadvantaged Community. Loss of surface water pursuant to the SED will negatively impact the already disadvantaged community. Available jobs and income will be reduced due to the impact on the District's agricultural economy.

As stated above, the District's only available source of supplemental surface water is that diverted from the Stanislaus River. Although the SED proposed modifications will have serious effects on other agencies, it will devastate the District. The recommendations of the SED will be disproportionately placed upon the back of the District and it's farming community.

For the above stated reasons, Central San Joaquin Water Conservation District cannot accept and therefore opposes the proposed modifications and any increase in releases. The District joins in the comments and statements of the South San Joaquin Irrigation District, the County of San Joaquin, and the Stockton East Water District.