

# San Joaquin River Group

- Modesto Irrigation District
- Turlock Irrigation District
- South San Joaquin Irrigation District
- San Joaquin River Exchange Contractors

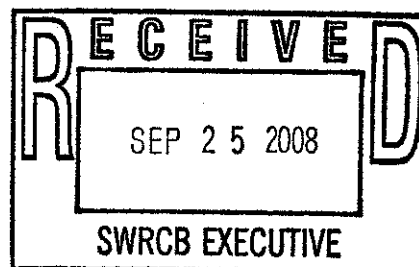
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- Merced Irrigation District
- Oakdale Irrigation District
- Friant Water Users Authority
- City and County of San Francisco

State Water Resources Control Board  
c/o Jeanine Townsend  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95812-2815

September 25, 2008

Re: Evidentiary Hearings-Salinity



Dear Members of the Board:

We agree with the SWRCB's assessment that San Joaquin River flow and salinity should be considered together. Our thought is to have separate hearings on salinity and then, if necessary, after the salinity and flow hearings have a hearing to match up the two components. Our belief is that there will be very little overlap between fishery flows and salinity except in understanding the total volume of water in the San Joaquin River and carryover storage in the reservoirs.

We propose the following evidentiary hearings for salinity objectives at Vernalis and Interior Delta.

- Hydrology
  - See SJR flow proposal
- Current Reasonable and Beneficial Uses
  - See SJR flow proposal
- Current Groundwater Use
  - See SJR flow proposal
- Modeling
  - CALSIM
  - DWRSIM
  - Other
- Hoffman Review and Analysis
- Salt Tolerance for plant species
- Soil conditions and EC
- Salt Loading:
  - Upstream Vernalis
  - Downstream Vernalis

- Beneficial Use for Ag in South Delta based on available water in the South Delta and the applicable water rights to divert such water
- Impacts of Ag Barriers on Interior Delta Salinity
- Impacts of Exports on Interior Delta Salinity
- USBR (non) activities
  - Drain
  - Land retirement
  - MAA/WDR
- Benefits of the Implementation of the Salt & Boron TMDL
- Vernalis Compliance since the 1995 WQCP

Very truly yours,  
O'LAUGHLIN & PARIS LLP

By:

  
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TIM O'LAUGHLIN

cc: SJRG