



**Comments by the Northern California Water Association to the  
State Water Resources Control Board Workshop on Water Quality Standards for  
the San Francisco Bay / Sacramento-San Joaquin Delta Estuary  
June 14, 1994**

**1. Introduction**

My name is Richard Golb, I am the Executive Director of the Northern California Water Association. We represent over 45 agricultural water districts, water companies and private landowners in the Sacramento Valley, encompassing over 600,000 acres of farmland. I will focus my remarks on the third question posed in the workshop notice; what effect do upstream water projects have on the fish and wildlife resources of the Bay-Delta Estuary?

Since anadromous fishery species begin their life upstream of the Delta, it is likely upstream projects and diversions may have in the past or now have some effect upon the fish and wildlife resources of the Delta.

There have been some upstream projects that have had a negative effect upon species which pass through the Delta, such as the winter-run salmon. The project that has had, possibly, the largest adverse effect is the Red Bluff Diversion Dam in Redding. Several years ago, the NMFS estimated that due to faulty design, almost 50% of the outmigrating salmon passing under the dam were lost to predation by squawfish. The problem is now being addressed; actions to remedy this situation include opening the dam's gates from November to May each year as well as structural improvements.

Overall, however, we do not believe that upstream agricultural diversions are now or have had in the past a significant adverse effect on the fish and wildlife resources that live in or pass through the Bay-Delta.

Many of the agricultural diversions in Northern California have been diverting water from the Sacramento River and its tributaries since the early 1900's. Some of these diversions date back to the 1800's. There are cases where specific diversions have had significant problems with certain fish species such as the winter run salmon. Yet, these are

unique and in fact, isolated cases that have received a great deal of regulatory attention. These cases are now being addressed by both State and Federal agencies under several laws, including the Endangered Species Act.

Additionally, the Central Valley Improvement Act (P.L. 102-575) signed into law in October, 1992, includes many provisions to address many of the fish and wildlife issues the Board is considering today. For example, this law provides 800,000 acre-feet of water annually and a \$50 million restoration fund for fish and wildlife purposes.

## **2. NCWA Responses**

Several of those who testified indicated that Northern California agricultural diversions have had adverse effects on the resources of the Bay-Delta. I would like to respond to some of these issues by pointing out the following;

Although there are over 300 unscreened diversions on the Sacramento River, (1,800 in the Delta), it is not known what cumulative or individual effect, if any, these diversions have upon the fishery. The NMFS, in their February 12, 1993 Biological Opinion for the operation of the Federal Central Valley Project and the State Water Project, stated that unscreened diversions, are only "suspected to be a significant cumulative impact."

Even assuming there is a problem, there is no reliable data that identifies that diversions are significantly harming the fishery. Despite this uncertainty, there are now five different State and Federal fish screening programs directed at diversions on the Sacramento River. Each of these programs operates independent from one another, and in all likelihood, not in the best interests of water users or the fishery.

### **Rice Pesticides**

The predominant crop in the Sacramento Valley is rice. Although many continue to criticize this particular commodity's runoff, these comments are outdated. Rice field runoff was, in fact, a problem in the 1970's and early 1980's. In response to this problem, the Central Valley Regional Water Quality Control Board, the rice industry and others developed the Rice Pesticide Control Program. This program has been characterized by

William Crooks, the Executive Officer of the Regional Board, as "one of the most successful water quality control programs in the United States."

The results of this program are impressive; in 1982 the total pesticide load in the Sacramento river attributable to rice field runoff was roughly 40,000 pounds. By 1992, that number had fallen to 178 pounds - a reduction of 99%. Stated another way, 1983 monitoring showed rice pesticide residues at Rio Vista as high as 12 parts per billion. During the 1993 monitoring program, rice pesticide residues were at virtually undetectable levels at all locations down river of the I Street bridge.

We believe the virtual elimination of rice pesticide residues in the Delta and in much of the Sacramento River, has effectively eliminated potential adverse effects for Delta fisheries from rice pesticide residues.

### **Sacramento Valley Habitat**

One issue we are greatly concerned with is the potential for State Board action that would favor the needs of the Bay-Delta ecosystem over the needs of the Sacramento Valley ecosystem.

For example, upstream diversions provide significant benefit to wildlife species that may be considered "wildlife resources of the Delta." The ricelands habitat program has been tremendously successful in providing habitat for migratory waterfowl and over 100 different wildlife species, 21 of which are listed as threatened or endangered by the U.S. and the State of California. Further, during the Spring of 1993, Point Reyes Bird Observatory biologists counted over 400,000 shorebirds in the Sacramento Valley, including 41% of these birds on ricefields. In November of last year, ricefields held nearly 70% of the shorebirds and 85% of one particular species. This is one example of the beneficial use of water and benefit for wildlife species in the Sacramento Valley.

### **Water Conservation**

In the last decade, Sacramento Valley water users have reduced water use significantly. Rice farmers have cut water usage by over 30%. This has been accomplished through laser leveling of land, shorter stature rice varieties, implementation

of recirculating irrigation systems and other means. According to research conducted by the California Rice Experiment Station, net use of water has declined dramatically; GCID service area, net use has dropped from over 7 af in the 1960's to slightly over 4 af per acre in the late 1980's.

**3. Recommendations for Board**

I would encourage the Board to consider all potential causes of the decline of certain species in the Bay-Delta. I agree with the comments of DWR that the Board should consider a comprehensive plan. The problem the board is struggling to resolve is not a simple one and it will not be resolved by a simple solution. As part of a comprehensive plan, I would urge the board to consider the following;

Regarding fish screens on the Sacramento River; The Board should support a proposal we submitted to the NMFS that government agencies implement a single screening program which screens only those diversions shown to be significantly harming the fishery. This would allow all government agencies to combine their technological expertise and necessary resources to better protect the fishery. In other words, a biologically based priority system.

I would also request that the Board urge other agencies to match their regulatory zeal with an equal financial commitment. The average cost of screening an agricultural water diversion runs in excess of \$10,000 per cfs. If we were to require all diversions on the upper Sacramento River to be screened, the costs could exceed half a billion dollars.

The Board must also recognize and provide credit for the tremendous restoration efforts and habitat values provided for and undertaken in the Sacramento Valley. This would include habitat for waterfowl and wildlife, water conservation and the reduction of rice pesticide residues. As the Board knows, these activities are expensive. For example, a 1990 estimate of the costs of the rice pesticide reduction program put compliance costs at roughly \$15 per acre. Annually, this program costs rice farmers nearly \$7.5 million.

We are greatly concerned with the lack of hard and sound science that seems to be guiding many of the proposals. And this lack of true biological science about what is

happening in the Delta further concerns us regarding the goals and objectives of differing agencies regarding water quality standards.

Finally, and most importantly, prior to the building of the State and Federal Projects, the U.S. government and the State of California made an oft repeated promise to the communities of Northern California. This promise, subsequently incorporated into State law, was a concession to the North in exchange for their support for these projects. As the Board knows, the Area of Origin laws were the cornerstones necessary to achieve consensus for the construction of the State and Federal projects.

We strongly support these laws. The Board must consider the intent and relevance of these laws as it works to develop water quality standards for the Bay-Delta.