

State Water Resources Control Board

JUL 09 2019

Ms. Karla Nemeth, Director
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Ms. Brenda Burman, Commissioner
Bureau of Reclamation
United States Department of the Interior
Washington, DC 20240

REQUEST FOR (1) A COMPREHENSIVE OPERATIONS PLAN AND (2) A PLAN FOR A MONITORING SPECIAL STUDY PURSUANT TO THE BAY-DELTA PLAN

Dear Ms. Nemeth and Ms. Burman:

On December 12, 2018, the State Water Resources Control Board (State Water Board) adopted amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan). See Resolution No. 2018-0059. The amendments, including revised salinity objectives, were approved by the Office of Administrative Law on February 25, 2019 and are now in effect under state law. In order to attain the revised objectives, the Bay-Delta Plan requires the Department of Water Resources (DWR) and the United States Bureau of Reclamation (USBR) to continue addressing the impacts of their operations on interior southern Delta salinity levels. We welcome DWR's and USBR's cooperation in achieving these objectives and fostering improved understanding of salinity in the southern Delta.

The Bay-Delta Plan requires: 1) a Comprehensive Operations Plan (COP) to mitigate the impacts of operations of the State Water Project (SWP) and the Central Valley Project (CVP) on increased salinity in the southern Delta, and 2) associated special studies to determine the appropriate locations and methods to monitor the efficacy of measures to reduce salinity levels. Specifically, the Bay-Delta Plan calls for a COP that:

- describe[s] the actions that will fully address the impacts of SWP and CVP export operations on water levels and flow conditions that may affect salinity conditions in the southern Delta, including the availability of assimilative capacity for local sources of salinity;

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

- include[s] detailed information regarding the configuration and operations of any facilities relied upon in the plan; and
- identif[ies] specific performance goals (i.e., water levels, flows, or other similar measures) for these facilities.
- Is developed through DWR and USBR consultation with the South Delta Water Agency, Contra Costa Water District, State Water Board staff, other state and federal resource agencies, and local stakeholders.

As described in the Bay-Delta Plan, DWR and USBR shall submit the COP to the Executive Director for approval within six months from the date of the OAL's approval of the Bay-Delta Plan amendment. The Executive Director will act on the COP after providing notice and opportunity for comment. Once approved, the COP shall be reviewed annually, and updated as needed, with a corresponding report submitted by February 1 each year to the Executive Director for approval. DWR, USBR, and other stakeholders are encouraged to engage in efforts to synthesize existing information regarding salinity challenges in the southern Delta that may be helpful to revisions and updates to the COP.

The Bay-Delta Plan also requires DWR and USBR to submit a plan for a monitoring special study to the Executive Director for approval by August 25, 2019. The special study is to (1) characterize the spatial and temporal distribution and associated dynamics of water level, flow, and salinity conditions in the southern Delta waterways; and (2) identify the extent of low or null flow conditions of any associated concentration of local salt discharges.

In accordance with the Bay-Delta Plan, DWR and USBR are required to submit a COP and a plan for a monitoring special study by August 25, 2019. We recognize that DWR and USBR may not yet have the benefit of information that is to be obtained through special studies or stakeholder input. Thus, at a minimum, the COP must include information about current operations and actions addressing the impacts of the SWP and CVP in the southern Delta and methods for adjusting those operations and actions based on information that will be obtained through special studies and other sources. Because DWR and USBR are required to consult and coordinate with other agencies and stakeholders to develop the COP, the COP should describe how DWR and USBR already have, and will, coordinate with SDWA, CCWD, and others. The COP should be revised as additional information is developed.

I have directed our staff to be available to answer any questions that you may have and to provide assistance as appropriate. For further logistics related to development of the initial COP, please contact Erin Foresman, Environmental Program Manager at 916-341-5359 or erin.foresman@waterboards.ca.gov.

Sincerely,



Eileen Sobeck
Executive Director

CC

Eric Oppenheimer,
Chief Deputy Director,
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