

1/6-7/11 Bd. Wrkshop  
SJR Technical Report  
Deadline: 12/6/10 by 12 noon

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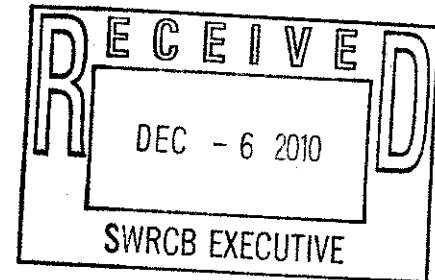
## CENTRAL DELTA WATER AGENCY

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December 6, 2010

Via email [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P. O. Box 100  
Sacramento, California 95812-2000



Re: San Joaquin River Technical Report Comments

Dear Ms. Townsend:

We join in the comments submitted by the South Delta Water Agency. It is particularly disturbing to see an effort directed at reducing water quality standards on the long-neglected San Joaquin River. Improvement of water quality for all beneficial uses should be the goal. Export of water from the Delta to the portions of the west side of the San Joaquin Valley which contribute to the degradation of the San Joaquin River has long been recognized as the source of the problem, yet exports have been allowed to continue. Salts which have not yet reached the river have been accumulating in the groundwater and soil and will result in degrading accretions for the foreseeable future. It is important to remember that in the San Luis Act of 1960 Congress required the San Luis Unit of the CVP not to go forward without a valley drain with an outlet to the bay or ocean. While a valley drain was and is particularly critical to the sustainability of agriculture along the west side, the adherence to the law would have significantly reduced the degradation to the San Joaquin River. The CVP deliveries assisted by the SWP coordinated operations and joint point of diversions are the cause of the problem. The CVP and SWP should be required to mitigate their impacts on the San Joaquin River before others are required to suffer a burden. A portion of the water exported from the Delta by the projects should be required to restore the San Joaquin River water quality. The exported water can be directly discharged to the San Joaquin River or exchanged to provide the needed flow. Improved San Joaquin River water quality will significantly improve the usability of the exported water thereby offsetting the loss of water or perhaps even providing a net benefit.

The argument over the water quality needs for agriculture has always hinged on the degree of leaching of salts from the root zone that can be reasonably achieved with the application of irrigation. The variability of soil types, proximity of the water table to the surface and economically sustainable practices must be recognized.

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board

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Beneficial water use along the river results in some degradation and the assimilative capacity of the river must be allocated for correlative use by the diverters in the watersheds and not solely to reduce the mitigation responsibility of the CVP and SWP.

Yours very truly,



DANTE JOHN NOMEILLINI  
Manager and Co-Counsel

DJN:ju