

SOUTH DELTA WATER AGENCY

APRIL 26 1994

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Comments regarding SWRCB workshop 4/26/94:

1. The present Water Quality Control Plan for salinity, dated May 1991 (WR 91-15), establishes new salinity objectives for southern Delta agricultural beneficial uses, as required by the Racanelli decision. However, these have not yet been implemented, with the Plan setting up staged implementation with Stage 2 (Vernalis and Brandt Bridge) "to be implemented no later than 1994" (WQCP p. 7-4). How does the Board intend to carry out this implementation? The Hearing Notice states (page 3, Key Issue 1) that "the SWRCB intends to review only the highest priority issues" and that these issues are "those for which EPA is now proposing standards". Further analysis of EPA concerns for fishery resources should not provide any justification for delay of implementation of these other objectives which are not being reviewed and which are long overdue for implementation, as was noted in the Racanelli decision in 1986. Implementation of existing objectives which were painstakingly developed over years of analysis is needed now and not further delay while considering additional objectives. How does the Board intend to meet its announced 1994 implementation requirements for beneficial uses and objectives not subject to this review?

2. If the Board does not begin to implement existing agricultural objectives, what effect would new fishery objectives have upon water availability and the ability to meet other existing objectives? Shifting the release of the limited San Joaquin system water that is available into April and May, to

meet the EPA-proposed objectives, would further reduce water available for streamflow at other times, particularly during the summer when needed to meet the southern Delta agricultural objectives. A thorough analysis should be made of water needed to meet any proposed EPA objectives and remaining water available for any such purpose after the additional water needed for present, and as yet unimplemented, WQCP requirements. Such an analysis should also include the effect of the increased groundwater overdraft that could be expected to result from the proposed increased instream water demands. It should also include an analysis of the effects on the dangerously low San Joaquin salmon population of the EPA proposals requiring large water releases for the EC objective to protect bass, an exotic species which feed upon the juvenile native salmon. Finally if it is decided to increase the protection of striped bass to the detriment of the native San Joaquin salmon, this quality objective should be accomplished not by increasing water releases but rather by timing the release of westside drainage from the CVP service area to the River to accommodate water quality needs.

In summary, it is important that the Board get about its business of implementing its existing Water Quality Control Plan pursuant to the commitments in that Plan, rather than overlook or forget about them in the process of considering additional water quality objectives for subsequent implementation.