



CENTRAL DELTA WATER AGENCY

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September 7, 2004

Item 1
Sept. 14, 2004 Workshop
hard cc: Board
Debbie Irvin

email: Board
CC, HMS, TH, CMW, BJL, DI
VAW, JWK, LJM, GK, JT

Debbie Irvin
Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812

**VIA FAX: (916) 341-5620
and U.S. FIRST CLASS MAIL**

Re: Draft Staff Report – Periodic Review – 1995
Water Quality Control Plan for the Bay/Delta

Dear Ms. Irvin:

In addition to the issues in proposed Resolution No. 2004-00XX we request that the so-called periodic review (late triennial review) include the following:

- 1.) Adding San Joaquin River flow objectives for Stockton at the point just upstream of Burns cutoff. Without an operable Head of Old River Barrier the Flows at Vernalis do not reliably reflect the San Joaquin River flows entering the Stockton Deep Water Ship Channel which are critically important to the fish which are intended to be protected by such objectives.
- 2.) The VAMP experiment should be an issue as it relates to the San Joaquin River pulse flow objectives. Adjustment of the VAMP flows to eliminate the double step and otherwise better fit the “naturally” available flows could result in significant savings of water. Revamping the VAMP to better fit the real needs of fish such as by using pulses of shorter duration and at different times based on the results already derived from the experiment should also be considered.
- 3.) San Joaquin River electrical conductivity upstream of the Merced should be an issue in that previous directions from the SWRCB to the Regional Water Quality Control Board have not produced results. The issue is of great importance but is quite controversial. SWRCB attention will be required in any event and including it as an issue at this time will conserve resources for all interested parties. How salinity upstream of the Merced River is address will to a great extent determine whether or not implementation of the other objectives will be achieved.

Debbie Irvin
Clerk to the Board
State Water Resources Control Board

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- 4.) Water levels should also be included as an issue in that beneficial uses cannot be protected under low river flow or high export pumping conditions without such objectives or a substitute therefor.
- 5.) Year round flow objectives for the San Joaquin River should be considered in that they are related to the protection of the beneficial uses to be addressed by the issues which the staff recommends be addressed.

The so-called periodic review should not be unduly constrained in that the goal is to provide protection for all beneficial uses. Whatever water related objectives are reasonably necessary to achieve such protection should be on the table for discussion.

Hard copies will be sent by mail.

Respectfully submitted,



DANTE JOHN NOMEILLINI, SR.,
Manager and Co-Counsel for the
Central Delta Water Agency

DJN/pe