

COUNTY OF SAN JOAQUIN

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7 **BEFORE THE STATE WATER RESOURCES CONTROL BOARD**

8 CONSIDERATION OF THE SOUTHERN) **COUNTY OF SAN JOAQUIN COMMENTS**
9 DELTA WATER QUALITY OBJECTIVES) **JANUARY 2007**
10 FOR SALINITY IN THE BAY-DELTA)
11 WATER QUALITY CONTROL PLAN)
12 _____)

13 The COUNTY OF SAN JOAQUIN ("County") submits its comments as a result of the call
14 for comments for a workshop scheduled for January 16, 2007.

15 The comments of the County of San Joaquin relate to issues of concern to the County as a
16 whole in this proceeding, primarily, the southern Delta salinity objectives.

17 **SALINITY OBJECTIVES**

18 1) Salinity Objectives for the Southern Delta Should Not be Changed. The southern Delta
19 salinity objectives, originally set forth in the 1978 Delta Plan, were developed in order to protect
20 southern Delta agricultural uses from the effects of elevated salinity. The objectives set an electrical
21 conductivity value of 0.7 mmhos/cm electrical conductivity ("EC") for the three interior monitoring
22 sites specifically Brandt Bridge on the San Joaquin River, Old River near Middle River, and Old
23 River at Tracy Road Bridge, as well as Vernalis from April through August.

24 These objectives are the product of many years of extensive research, in which numerous
25 studies were performed and in which a majority of interested parties were involved. The studies and
26 research determined that a standard of 0.7 EC was needed because the wide variety of soil conditions
27 (more than 70 types) in the region have different permeability qualities and many require low
28 salinity irrigation water to prevent crop damage from salt. The County feels strongly that any

1 relaxation of the current standard of 0.7 EC would adversely affect agricultural practices and
2 production in the southern Delta. Therefore, it is the County's position that the current salinity
3 objectives remain unchanged.

4 2) Salinity Objectives Should be Met By Using Water From Multiple Sources, and Not
5 Overburden New Melones. The salinity objectives to the extent they have been met, are met by
6 releasing dilution water from New Melones Reservoir. Releases from New Melones are currently
7 used to meet salinity objectives at Vernalis. San Joaquin County fully supports meeting the current
8 salinity standards for the southern Delta at all required points, but San Joaquin County strongly
9 objects to the current level, or any increased reliance on New Melones for dilution.

10 The reason for San Joaquin County's objection to the use of water at the present level or an
11 increased level for dilution is that the use of New Melones water for dilution results in a decrease in
12 the amount of water the Bureau of Reclamation ("Bureau") can furnish to the Central San Joaquin
13 Water Conservation District and the Stockton East Water District under the contracts of those
14 Districts with the Bureau. Much of Eastern San Joaquin County, including the City of Stockton, is
15 located over a severely overdrafted groundwater basin which presently cannot be replenished
16 because of a lack of water supply. The overdraft is critical and results in the movement of saline
17 water from under the Delta into the basin. The inability of the Bureau of Reclamation to deliver
18 water to its two customers Central San Joaquin Water Conservation District and Stockton East Water
19 District directly exacerbates the groundwater overdraft in the eastern San Joaquin County ground
20 water basin.

21 Therefore, it is the County's position that salinity objectives should be met by utilizing
22 numerous sources, and not relying on New Melones water to carry out this responsibility.

23 3) Additional Studies. The Notice for this Workshop specifically calls for additional studies
24 on the issue of Southern Delta Salinity. The County of San Joaquin does not believe additional
25 studies are necessary, since the earlier studies on which the present standards are based were
26 extensive. If additional study is to be undertaken, the County concurs with the South Delta Water
27 Agency that any studies should include the following necessary and relevant individual studies:
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2 3A. Effect of CVP deliveries on San Joaquin Valley groundwater gradient;
3 3B. Effect of CVP deliveries no San Joaquin Valley groundwater quality.
4 3C. Effect of CVP deliveries on San Joaquin Valley groundwater entering S.J. River;
5 3D. Effects of CVP deliveries on leaching of naturally occurring soil salts;
6 3E. Location and anticipated movement of salts delivered to San Joaquin Valley by CVP
7 which are not directly drained into River through surface channels or structures;
8 3F. Water quality conditions in the San Joaquin River if Exchange Contractors received San
9 Joaquin River water instead of DMC water;
10 3G. Change to assimilate capacity of River due to upstream consumptive uses and out of
11 basin deliveries;
12 3H. Change to assimilative capacity of River due to importation of CVP salts;
13 3I. Expected location and movement of selenium and salts retained in Grasslands Bypass
14 Project area;
15 3K. Effects of additional deliveries to wetlands on River salinity;
16 3L. Effects of transfers on River's assimilative capacity;
17 3M. San Joaquin River bank storage and accretions under changing hydrological conditions.
18 In addition, the workshop process should include the establishment of salinity standards upstream of
19 Vernalis.

20 EXPORT LIMITS

21 1) Current Export Limits Should Remain Intact or Decrease. The current regulations specify
22 the upper limits for flows and exports that are necessary to protect fisheries. Higher flows and lower
23 exports provide greater protection for fisheries. It is the County's position that exports should not
24 exceed the existing limits and should, if anything, decrease.

25 OTHER

26 1) 0.7 EC Salinity Objective Period Should Be Expanded. The County supports expanding
27 the months which the 0.7 EC standard should be imposed. The standard is currently in place April
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1 through August. The County is in favor of expanding the period from March 1 through September
2 30.

3 2) Minimum Flows Into the Delta and Minimum Water Levels Should Be Maintained To
4 Protect Agricultural Beneficial Uses. Minimum flows are necessary to maintain sufficient flow to
5 operate temporary and proposed permanent barriers, and to provide necessary water levels in areas
6 no longer subject to Delta tides.

7 Further, minimum water levels are necessary to protect agricultural diverters and fish and
8 wildlife in areas of the Delta, such as the Middle River. Portions of the Delta, including Middle
9 River, have extremely low flows or even go dry at certain times of the year. This precludes senior
10 water right holders and parties protected by the Delta Protection and Area of Origin Acts from
11 exercising their water rights. The County supports the establishment of minimum flows and
12 minimum water levels to protect these water rights, fish and wildlife and all other beneficial uses and
13 urges you to undertake necessary studies to support minimum flow and water level standards.

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15 Dated: January 4, 2007.

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17 By: 
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