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CALFED Bay-Delta Program
 1416 Ninth St., Suite 1155
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 Attention: Rick Breitenbach

We are writing to comment on some of the assumptions used in modeling the No Action Alternative.

In most respects it is appropriately assumed that the CALFED's No Action Alternative will comply with the SWRCB's Control Plan Standards. However, the adopted modeling assumptions do not plan to abide by the Control Plan standards for flow and salinity at Vernalis. The modeling has instead been based on the current USBR "New Melones Operations Plan" including "the interim operations plan", and the CVPIA PEIS Administrative Draft Report. See pages A-5, A-6, A-7. This USBR plan proposes caps on the New Melones releases required for compliance with the Vernalis salinity standard (Pages A-13, A-16). The Control Plan and the SWRCB New Melones permits contain no such caps. USBR's own modeling indicates that these capped amounts would be insufficient to meet the standard in 31% of the water years even if no water acquisitions were made from San Joaquin tributaries. The USBR's Plan further proposes to make acquisitions which will have the effect of shifting summer flow to April 15 to May 15 flow with the result that further salinity violations will occur.

Per page A-7, the modeling is also based on ratios of exports to Vernalis flow that are not in the SWRCB's Control Plan. Strict adherence to these ratios would preclude the proposal to meet the Vernalis pulse flow requirements in part by recirculating water from the DMC to the river with recapture and return to the DMC. This proposal has been modeled by DWR. This reuse of water appears to be a more efficient, less expensive, and therefore more reasonable way to provide the pulsed fish flow than to take water from existing beneficial uses in the overcommitted San Joaquin River System and thereby exacerbate violations of the Vernalis salinity standard.

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The SWRCB has not yet determined how the Vernalis spring pulse flow should be implemented. It has not approved the AFRP flows or a Vernalis export/inflow ratio of less than one. Neither has it agreed that the Vernalis salinity standard need not be met. It seems highly inappropriate for the No Action Alternative to assume that the USBR's proposed salinity violations, and its proposed inefficient use of tributary water for Vernalis pulsed flows would prevail in the absence of the CALFED Plan. The No Action Alternative should clearly be corrected.

Sincerely,


Alex Hildebrand

cc John Herrick
Dan Nomellini
David Guy
John Winther
Steve Macaulay
San Joaquin Farm Bureau