

SOUTH DELTA WATER AGENCY

23443 S. Hays Road

Manteca, CA 95337

March 19, 2000

Steve Ritchie, Acting Executive Director
CALFED Bay-Delta Program
1416 9th Street, Suite 1155
Sacramento, CA 95814

Re: South Delta Water management and recirculation

Dear Steve:

We are very concerned by the extensive work plans presented at the public meeting in Tracy on March 16. We are not criticizing any of those who made presentations. However, CALFED seems to have directed these people to make extensive further studies of numerous alternative proposals for water management in the South Delta and for methods and times of recirculation of DMC water. Further studies of most of these alternatives appear to us to be merely an excuse to postpone decisions while frittering away time and money without adding to the objective technical information needed to make decisions regarding these management options.

South Delta Water Management

CALFED is still studying in detail barrier configurations and barrier operating schedules that can readily be shown to be unworkable, inadequate, and disregarding of the interrelations between these proposals and the feasibility of achieving other CALFED goals and responsibilities. We don't need more studies to show that alternatives that do not include three tidal barriers operated on an as needed basis can not succeed.

- 1) They can not mitigate the impact of export pumping on South Delta in-channel water supplies. (CALFED's proposed change in operations at Clifton Court will approximately double the existing impact of State and Federal pumps which already intermittently suck South Delta channels dry and destroy the circulation needed to control water quality).
- 2) These alternatives can not comply with the State's internal South Delta salinity standards.

Steve Ritchie
March 19, 2000
Page 2

- 3) They can not comply with the dissolved oxygen standard in the Stockton ship channel.
- 4) They can not stop the annual reexportation of several hundred thousand tons of salt which is imported into the valley via the DMC and which then drains to the river from which it is sucked back through South Delta channels to the Federal pumps for reexport.
- 5) They can not, therefore, reduce the salinity of the DMC water which is delivered to Tracy, to westside agriculture, and to grasslands and wetlands near Los Banos.
- 6) They can not protect from entrainment the downstream anadromous fish migrants that migrate outside of the April 15 to May 15 period.
- 7) They can not keep the trash that comes down the river from plugging fish screens at the Federal pumps.
- 8) They can not direct the sediment load that comes down the river (about 200,000 yards/year on average) to reduce the sediment entering Old River and move it toward the ship channel where it can be removed as part of the ongoing channel maintenance.
- 9) They can not comply with the Delta Protection Statutes.

It is argued that these unacceptable alternatives must be studied for inclusion in an EIR, but it doesn't take any additional study to establish that these alternatives can not meet CALFED's goals, responsibilities, and legal requirements. It is also not necessary to do more study to establish that CALFED's proposed channel dredging can not substitute for tidal barriers in meeting Delta salinity and DO standards, or in meeting any of a number of other needs.

Recirculation

CALFED has again distributed proposed analyses of the potential for providing fish flows and water quality control in the San Joaquin River by recirculation of water released from the DMC. The analyses proposed are needlessly expensive and are based on complex and contentious methods and timing of circulation. They appear designed to get recirculation rejected, as explained in our unanswered December 11 letter to you after

the previous December 9 public meeting in Tracy on these topics. CALFED refers to a review of recirculation by USBR that was very cursory and was made at a time when USBR wanted to avoid any meaningful examination of recirculation in their PEIS for purchase of tributary water. CALFED does not even acknowledge SDWA's much more careful study of a simple, limited proposal that would save a lot of water and provide other benefits without jeopardy to any water user.

SDWA's proposal was developed in meetings attended by Dan Nelson, by representatives of the Friant Water Users, the Exchange Contractors, and the Merced and Tuolumne tributary districts. It was then modeled by DWR with technical oversight from representatives of USBR, the Regional Water Quality Control Board, the Contra Costa Water District, Dan Nelson, and SDWA. It was presented in detail in hearings before the SWRCB. It was the genesis of CALFED's recognition of the need to examine the concept, and of the SWRCB's recent mandate that the concept be studied by USBR. Yet CALFED proposes to ignore SDWA's proposal.

CALFED emphasizes various speculative objections to recirculation and seems to ignore benefits such as improved flow and quality downstream of the Merced. Most of these speculative objections are hypocritical.

- It is speculated that recirculation would detrimentally encode salmon smolts with DMC water. This objection has not been raised when DMC water is purchased from the Exchange Contractors for pulsed fish flow, or when large quantities of DMC water are allocated to wetlands which then drain to the river, or when Merced water is purchased to flush Stanislaus smolts.
- It is speculated that a long list of natural toxic metallic ions may be flushed into the river from the Newman Wasteway. No logical basis is presented for this speculation, and it could easily be tested by monitoring a brief release. No such speculation regarding these ions was allowed to inhibit implementation of the Grassland Bypass project.
- It is speculated that increased pumping to recirculate San Joaquin water will cause significant increased entrainment of fish at the export pumps even though there would be no increase in the Sacramento water and fish drawn across the Delta. CALFED has adopted a twelve year VAMP test to determine the effect, if any, of increased pumping on fish entrainment even with increased crossflow of Sacramento water. Why can't CALFED also adopt a monitored test of recirculation to determine whether these speculations have validity and, if so, how they might be addressed?

Steve Ritchie
March 19, 2000
Page 4

We urge CALFED to stop making unneeded studies of demonstrably unacceptable alternatives and get on with reasonable solutions. Endless study of worthless alternatives destroys confidence in CALFED's ability to solve problems in an efficient, balanced, timely, and unbiased manner.

Sincerely,


Alex Hildebrand

cc Lester Snow, Regional Director, USBR
Assemblyman Mike Machado
Assemblyman Dennis Cardoza
John Herrick for distribution to SDWA Board
Tracy Press (Jack Eddy)
The Record (Jim Nickles)
Manteca Bulletin
San Joaquin Farm Bureau