

SOUTH DELTA WATER AGENCY

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On September 22 at Tracy your team presented to the public recent modeling analyses that purported to evaluate water level and water quality consequences of CALFED's previously adopted South Delta plan. We offer the following questions and comments on those analyses.

1) The presentation appeared to assert that water levels at the west end of Grantline Canal would be largely unaffected by the rate and time of intake of water into Clifton Court, and that the effect on water level at a given rate of intake would be no more during a low natural tide than during a high natural tide. Can you supply a logical hydrologic explanation for this assertion? Past measurements of water level drawdown have indicated that a typical drawdown was about one tenth of a foot for each 1000 cfs of either CVP export pumping or intake rate into Clifton Court (refer for example to the 6/1980 SDWA-USBR report). How do you reconcile your analysis with that data? Was the current model calibrated to comply with measured drawdown data?

2) The analyses presented were for a flood year and for a drought year. It is important to consider all types of years including these extremes. However, the extremes are not typical. We don't have water quality problems during high flows and don't have low water level problems during floods. In drought years export rates are low and the entire San Joaquin watershed is now short of water for fish, for water quality, for exports, and for consumptive water needs in the watershed and the South Delta.

3) The base case presented was no barriers and no export pumping. However, that is not a "no project" case. All entities that are dependent on the South

Delta's in-channel water supply are entitled to adequate mitigation of all CVP and SWP impacts on that supply which includes more than drawdown by export pumping. This is required by the Delta Protection Act (WC12200 et seq). The CVP reduces the flow at Vernalis by about 350,000 acre feet during the irrigation season in an average year per the 6/99 SDWA-USBR joint report. This is primarily due to exports from Friant. The CVP also causes drainage of roughly 400,000 tons of salt into the river from its westside service area. The CALFED plan, by eliminating the Grantline barrier, ignores the fact that elimination of the barrier also permits the recapture and reexport of this river salt load. CALFED's analyses to date do not address the consequence of these CVP impacts and the consequences over time of reexporting this salt load.

4) What does your analysis show regarding the effect of exports on water levels at the bifurcation of Old River from the San Joaquin River with various combinations of barriers and Vernalis flows? How does drawdown of water level at that location affect the flow into Old River versus the flow toward or from Stockton, particularly when exports typically exceed Vernalis flow? How does this affect (a) the DO problem near Stockton, (b) the salinity in interior South Delta channels, and (c) the salinity at the "Brandt Bridge" water quality standard with and without a Grantline barrier? Has your model been calibrated to comply with measured flow and quality values at these locations?

5) How does CALFED's plan affect the dispersal of Tracy's sewage outfall when the HOR barrier is functioning at times when two tidal barriers are to be permitted and at times when operation of the HOR barrier is proposed without any tidal barriers?

6) When do you anticipate making the other analyses requested in my August 27 memo to you?

CALFED had adopted South Delta water management plans prior to technical analyses of those plans and without participation by in-Delta interests. It has now begun technical analyses of this plan without first seeking input by in-Delta interests in the design of the analyses. We believe that this approach is inefficient and not conducive to reaching a common understanding of the technical merits and impacts of CALFED's plan. We again request that we be invited to participate in the design of the technical analyses needed to evaluate the plan.

Thank you for your consideration of these questions and comments.

cc Assemblyman Mike Machado
Steve Roberts
Tom Zuckerman

Margit Aramburu
SDWA Board Members