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# STATE WATER RESOURCES CONTROL BOARD BAY-DELTA WQCP SUBSTITUTE ENVIRONMENTAL DOCUMENT

Stockton East Water District

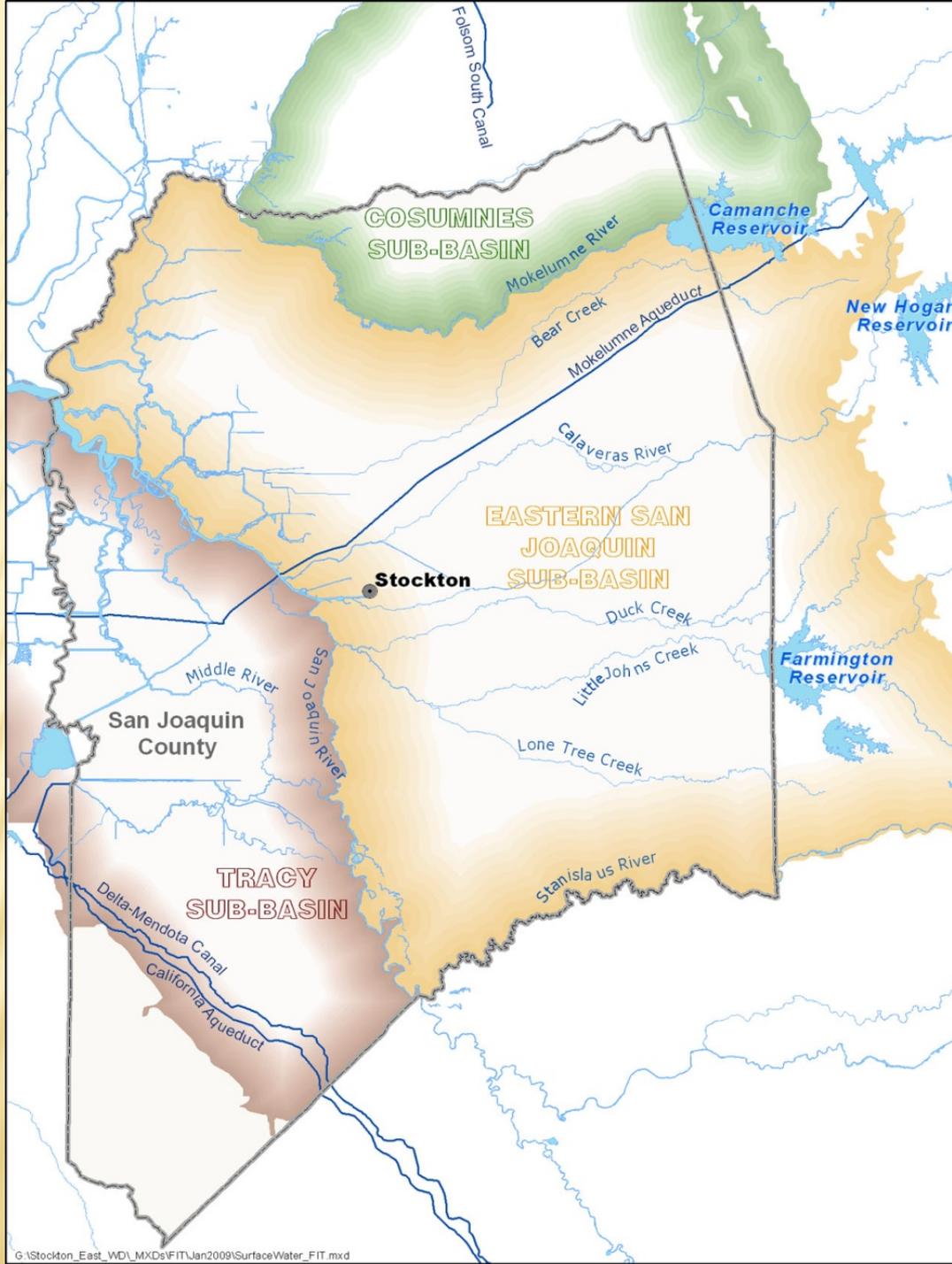
March 21, 2013



# BACKGROUND INFORMATION

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- ✘ Stockton East WD provides surface water for both agricultural and urban uses
- ✘ Stockton East WD encompasses approximately 143,000 acres. Roughly 95,000 acres are in agriculture and 48,000 acres are urban - 170,000 AF agricultural demand – 50,000 AF M&I demand
- ✘ The provision of surface water to our customers supports San Joaquin County's \$2.2 billion agricultural industry and 300,000 residents in the City of Stockton



# EASTERN SAN JOAQUIN GROUNDWATER BASIN

- ✘ DWR declared the basin in a state of “critical overdraft” in 1980
- ✘ Historic groundwater overdraft had dramatic effects on water levels and water quality
- ✘ Groundwater levels declined by as much as 2 feet per year and in some areas up to 80 feet below sea level
- ✘ Ancient saline brine advances along the western edge of the Delta and threatens the destruction of the basin



# EASTERN SAN JOAQUIN GROUNDWATER BASIN

- ✘ Historically, groundwater overdraft was caused by both urban and agricultural pumping and a lack of available surface water supplies
- ✘ Water districts within the County actively sought supplemental surface water supplies and were directed to the Mokelumne and American Rivers, but those surface water supplies never materialized
- ✘ Groundwater overdraft not caused by urban development

# SURFACE WATER DELIVERIES

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- ✘ Stockton East WD began providing surface water to its agricultural customers along the Calaveras river in late 1960s
- ✘ Stockton East WD teamed with its Urban Contractors in the late 1970s to construct a water treatment plant to provide treated surface water to the City of Stockton
- ✘ Recognizing the need for additional surface water in 1983 Stockton East WD contracted with Reclamation for 75,000 of water from New Melones Reservoir for both Agricultural and M&I supplies
- ✘ The District constructed \$65,000,000 of improvements to bring Stanislaus River water to the region

# SURFACE WATER DELIVERIES

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- ✘ Stockton East WD water treatment plant was originally a 30 MGD plant and subsequently was enhanced in the 1990s and 2000s and now regularly supplies 60 MGD of treated surface water – supplying 50,000 AF annually
- ✘ Groundwater levels within the City of Stockton have improved dramatically with the provision of the treated surface water supply

# STATE WATER BOARD SED FATALLY FLAWED

- ✘ Baseline Conditions Are Erroneous
  - + DWR Reliability Study
  - + CVP Contractor Allocation 90TAF instead of 155TAF
  - + VAMP flows included
  - + June 2009 BiOp (Cumulative Effects)
- ✘ As a result of these faulty assumptions entire SED analysis fatally flawed
- ✘ Completely misrepresents impacts of State Water Board action
- ✘ Impossible to evaluate environmental affects to groundwater, agricultural resources and municipal service providers because baseline depicted incorrectly

# STATE WATER BOARD SED FATALLY FLAWED

- ✘ Stanislaus River CVP Contractor deliveries severely limited?
  - + Table 5-21 shows 73,000 AF increase in diversion under 20% and reduction of 8,000 AF in 40%
  - + Table 5-22b shows on average 181,000 reduced deliveries which is more than the 155,000 CVP contractor demand
- ✘ SED must quantify reduction in surface water deliveries to Stanislaus River CVP contractors and analyze the impact:
  - + Eastern San Joaquin Groundwater basin from increased pumping in both agricultural area and urban area
  - + Agricultural production in San Joaquin County
  - + Impact to groundwater basin underlying the City of Stockton and the effects on increased groundwater treatment costs and the effects of saline brine further into groundwater basin

## IMPLEMENTATION PLAN FOR SALINITY OBJECTIVES

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- ✘ The Preferred Alternative proposes to modify the Southern Delta salinity objectives to 1.0 EC year round. Stockton East WD has no position on the what is the appropriate objective. The objective needs to be protective of agricultural beneficial uses
- ✘ However, program of implementation contemplates conditioning Reclamation water rights at New Melones to meet the existing objectives of 0.7 EC during the irrigation season

# IMPLEMENTATION PLAN FOR SALINITY OBJECTIVES

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- ✘ The proposed implementation plan violates the Clean Water Act
- ✘ The proposed implementation plan violates specific Congressional directive found in Public Law 108-361 [HR 2828] which requires a program of implementation to reduce the reliance on New Melones for meeting water quality objectives
- ✘ SED is required to evaluate a reasonable range of alternatives and fails to do so