

**Delta Wetlands' Testimony**  
presented to the  
**State Water Resources Control Board**  
at the Public Hearing on the  
**Consideration of a Water Quality Control Plan for the  
San Francisco Bay/Sacramento-San Joaquin Delta Estuary**

February 23, 1995

Delta Wetlands' Testimony  
State Water Resources Control Board  
Hearings on the Water Quality Control Plan for the  
San Francisco Bay/Sacramento-San Joaquin Delta Estuary\*

Members of the Board, Mr. Pettit, Members of the Staff:

I am pleased to make the following comments on behalf of Delta Wetlands regarding the draft Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary. The plan reflects the intense effort put forth by the Board, its staff and those who crafted the State and Federal agreement. Delta Wetlands is optimistic that the proposed standards will provide the protection and certainty required by all users of the Delta, including fish and wildlife, and agricultural, urban and industrial entities.

In Delta Wetlands' view, the adaptive management strategies and real time monitoring ideas in the plan are concepts overdue for use in the Delta. Delta Wetlands strongly supports the flexibility inherent in a plan that provides specific standards along with an operations group capable of evaluating conditions and recommending modified operations consistent with the environmental protection of the Delta and efficient management of the State's water supplies.

Viable Offstream Storage Project

I would like to begin by pointing to an apparent oversight by the Board, namely the failure to identify Delta Wetlands as a potential offstream storage project. The Environmental Report appendix to the draft plan recognizes the ability to enhance water supply reliability by constructing additional offstream storage. Projects identified in the report as being "under consideration or development" are Los Banos Grandes, Domenigoni Valley and Los Vaqueros. Delta Wetlands should be included among this group.

The Board is presently processing Delta Wetlands' water rights applications. With the release of the Water Quality Control Plan, the project's environmental documentation should be completed in relatively short order. When these documents are prepared and circulated, Delta Wetlands will be ready to proceed to hearing. Once approved, Delta Wetlands can be operational within a year.

Delta Wetlands is a viable project in terms of providing water supply reliability, conserving water that would otherwise flow to the ocean in excess of Delta outflow requirements. The project offers a ready supply of water located in the southern Delta. Because

---

\*Presented by James L. Easton, Vice President, HYA Consulting Engineers, on February 23, 1995, at Sacramento, California.

of its location and proximity to the export facilities, Delta Wetlands would be able to respond rapidly to water supply needs. Water diverted to storage on Delta Wetlands' reservoir islands could be exported later in the year when sufficient capacity is available at the export facilities. Water stored on Delta Wetlands' reservoir islands also could be used to contribute to Delta outflow.

It is the flexibility, strategic location and rapid response capability which merits consideration of Delta Wetlands as an important component in the Board's recommendation to improve water supply reliability by increasing offstream storage. For these reasons, Delta Wetlands should be included in the environmental document as a viable offstream storage project presently under consideration.

#### Application of the WQCP Standards to Delta Wetlands

The Delta Wetlands EIR/EIS is being prepared by Jones & Stokes Associates under the direction of the Board and the U.S. Army Corps of Engineers. The document is being revised presently to evaluate Delta Wetlands' operational impacts under the Water Quality Control Plan standards. The analysis includes a broad range of interpretations of the new standards to consider a variety of operational scenarios. Modeling shows that Delta Wetlands remains a viable project under the new Water Quality Control Plan standards.

We recognize that the draft standards do not specifically describe how a facility such as Delta Wetlands will operate. Nor do the standards provide how north to south water transfers or in-Delta water transfers will be treated. We believe these types of projects can function within the guidelines set out in the Water Quality Control Plan. All that remains to be determined is how the standards will be interpreted in certain situations. Delta Wetlands urges the Board to consider carefully the varying projects and conditions that could occur in the Delta, and to recognize the similarities and distinctions between the projects when evaluating how the standards will be applied.

Delta Wetlands is not proposing specific interpretive language for the Board to consider at this time. We understand that, because of the size, location and importance of the Delta Wetlands project to both water supply reliability and to water transfers, the Board may want to hold in abeyance any decision concerning how the standards will be applied to in-Delta storage projects, such as Delta Wetlands. If the Board decides to wait until the upcoming hearing on Delta Wetlands' water rights applications, it will then have the opportunity to evaluate specifically Delta Wetlands' analysis and to utilize the tremendous amount of thought and energy given to this subject.

At a minimum, however, we believe the Water Quality Control Plan standards should be recognized to encompass all exports from the Delta through the CVP/SWP pumping facilities, including Bureau and State Water Project contract water, water transfers, and water from in-Delta storage projects like Delta Wetlands.

## Conclusion

The standards presented in the Water Quality Control Plan represent an opportunity to define conditions in which water supply operations and fish and wildlife protection can coexist. The standards not only provide rules in which water supply projects must operate, but also a recovery-based approach to meeting fish and wildlife needs. It is clear that so long as the standards are being met, adequate environmental protection is being provided.

The Board should recognize the far-reaching affects of its efforts when considering other projects in the Delta, such as north to south water transfers and in-Delta storage projects like Delta Wetlands'. These projects should be evaluated in terms of their ability to operate within the standards and not only in terms of their environmental effect on the Delta, but also for their potential to enhance overall water supply and contribute to more efficient management of the Bay/Delta ecosystem.