

WRITTEN COMMENTS OF WOODBRIDGE IRRIGATION DISTRICT

on

DRAFT WATER QUALITY CONTROL PLAN FOR THE
SAN FRANCISCO BAY / SACRAMENTO-SAN JOAQUIN DELTA ESTUARY,
and DRAFT ENVIRONMENTAL REPORT APPENDIX

BEFORE THE STATE WATER RESOURCE CONTROL BOARD

DIVISION OF WATER RIGHTS
STATE OF CALIFORNIA

IN THE MATTER OF THE CONSIDERATION OF A WATER)
QUALITY CONTROL PLAN FOR THE SAN FRANCISCO/)
SACRAMENTO - SAN JOAQUIN DELTA ESTUARY)
_____)

Comments of:

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Introduction

Woodbridge Irrigation District is located north of Stockton and south of the Mokelumne River, west of Highway 99. The District diverts water from the Mokelumne River at Woodbridge, under pre-1914 and post-1914 appropriative rights, for agricultural use from the Mokelumne River for service to approximately 13,000 acres within its boundaries. East Bay Municipal Utilities District owns and operates Pardee and Camanche Reservoirs upstream on the Mokelumne River.

COMMENTS

General. It is difficult for water rights holders other than the CVP and the SWP to comment on the proposed standards in the Draft Water Quality Control Plan, until the water rights holders know how the Board proposes to accomplish those objectives and standards as against the other water rights holders (the future water right proceeding), and until such other water rights holders are able to evaluate the resulting environmental impacts upon their own areas and users.

"The water right decision, which is anticipated before June 1998, will allocate responsibility for meeting the objectives among water rights holders in the Bay-Delta Estuary watershed and establish terms and conditions in appropriate water rights permits." Draft Water Quality Control Plan, at page 24.

It is not possible for such water users to evaluate the environmental effects of any such future allocation of responsibility until specific proposals can be considered.

"The SWRCB has not determined who will share that responsibility (of the distribution of water supply impacts to specific water users), or how the impacts will be allocated. In this analysis, the SWP and the CVP are used as surrogates in order to determine the overall water supply impacts of the preferred alternative. The allocation process will be the subject of a water rights proceeding which will commence following adoption of the draft plan." (Draft Environmental Report Appendix, p. VII-5.).

"DWRSIM does not distribute the impacts of changes in regulatory conditions among all the water users in the Central Valley. Rather, the model assumes that upstream depletions in the Sacramento and east Side San Joaquin valleys are set and shortages borne by the exporters. In order to estimate any land use changes that might occur in upstream areas, assumptions regarding the allocations of shortages among all of the water users must be made. This issue is the subject of the water right phase of these proceeding which will commence upon adoption of the plan. The assumption used throughout this report is that the CVP and SWP are surrogates for the entire water system, and these projects bear all shortages. (Draft Environmental Report Appendix,

p. VIII-58.).

Thus the Board must, before undertaking to allocate the impacts of the preferred alternative upon water rights holders other than the CVP and SWP, prepare an environmental analysis that would result from those impacts upon such water rights holders.

Necessarily then, the Board must further preserve the opportunity for such other water rights holders to address the standards in the Water Quality Plan, after the impacts of these standards upon their water rights is known to them. Only then can the standards be measured and balanced against the burdens their attainment imposes on such water rights.

FURTHER COMMENTS ON DRAFT ENVIRONMENTAL REPORT APPENDIX

Page IV-24., 4th para. Partial stream regulation on the Mokelumne River is also afforded by Camanche Dam in addition to Pardee Dam. (Camanche Dam was included in the table IV-2. with a capacity of 431,000 acre feet.)

V-79. Causes of Declines. The effects of dams vary river system by river system. However, in the Mokelumne River system salmon numbers are at average levels for numbers of returning adult salmon, and many other factors must also be considered. The number of adults returning to the Mokelumne in 1994 numbered 3,221 fall run adult salmon compared to a total yearly average from 1940-1994 equaling 3,179 (EBMUD studies on the Mokelumne, hereinafter "EBMUD"). Factors other than dams and water flow must be considered. Factors such as the ocean harvest (or mining) of salmon stocks and commercial and sportfishing of salmon should be further controlled, and eliminated if necessary to allow the specie to rebound.

FALL RUN SALMON ESCAPEMENT: 1990-1994				
YEAR	TOTAL RUN AT WID	HATCHERY RETURNS	NATURAL SPAWNERS	NUMBER OF REDDS
1990/91	497	68	429	71
1991/92	410	41	369	127
1992/93	1645	710	935	343
1993/94	3157	2164	993	539
1994/95	3221	1918	1303	770

source: EBMUD 95

V-81. **Effect of Pulse Flows.** The effect of pulse flows as an attraction to migrating adult salmon is unproven on the Mokelumne River system (EBMUD). Weather systems and other less understood factors may play a greater role in attracting salmon than the artificial releases of water from Camanche Reservoir on the Mokelumne. In 1994 an early weather system triggered more adult salmon to begin their up-migration into the Mokelumne than later releases of water. The phenomena of pulse flows is yet to be determined on the Mokelumne and should not be construed as an effective and scientifically proven method to attract fish into the Mokelumne.

V-82. **Effects of Predation.** Predation of young outmigrant salmon fry and smolts is a major factor limiting the number of returning adults. Predation has largely been ignored by the Department of Fish and Game in augmenting salmon populations. Predators of young salmon and competitors of the Salmon specie include: Squawfish, Shad, and Striped Bass. Stomach sample surveys of Striped Bass below the Woodbridge diversion dam showed between 3 and 20 young salmon smolts eaten by each of an estimated 500-1000 stripped bass in a 1993 survey. Woodbridge would urge that greater attention be paid to the effects of predators both in the Mokelumne and the Delta for improvement to the numbers of out-migrants.

VIII-62. **Effects in Export Areas, Groundwater Pumping.** Although this Section only addresses the effects in "export areas", any reduction of Woodbridge Irrigation District's surface water supply from the Mokelumne River would likewise result in a greater reliance of ground water in its service area, in order to meet the proposed implementation of the standards. Brackish water intrusion into the Eastern San Joaquin County groundwater basin due to already-existing deficiencies is estimated at 70,000 acre feet annually and will become greater as demand increases for groundwater. (United States Bureau of Reclamation's American River Studies.) Depths to water table are currently 50-60 feet in many parts of the Eastern San Joaquin County basin and would increase if surface water diversions are curtailed. The Woodbridge Irrigation District has recognized the need to manage the current overdraft and considers the Mokelumne River supply which is distributed by its canal system as a vital part of the solution in controlling and managing critical overdraft problems by municipal and agricultural users overlying the basin. The District is currently developing a groundwater management plan under AB 3030. Currently in an inventory and assessment study phase, Woodbridge's program could eventually include storage of surface water supplies in the underground in wet years for use in dry years.

Woodbridge Irrigation District surface diversions from its Mokelumne are already reduced in dry years under its water rights settlement agreements with East Bay Municipal Utility District. The District's normal year entitlement of 60,000 acre feet is reduced 35% in dry years when the total inflow into EMBUD's Pardee dam is less than 375,000 acre feet per annum. Any further reductions in dry years would impose extreme hardships on District

water users who are already faced with a 35% reduction in water supplies. Permanent reductions would force the greater reliance on groundwater and exacerbate the current critical overdraft in the Eastern San Joaquin County Basin.

IX-7. - 2. Improve Fish Survival at SWP and CVP Export Facilities. Delta outflow can only be improved by the limiting exports of entitlement water and water transfers by the CVP and SWP. Limiting Delta withdrawals for export during critical migration periods can only help to reduce the take of salmon egg, fry, and smolts that may be entrained in the screens, and will increase the amount of water available for Delta outflow.

IX-11. - 8. Minimizing Losses. Many of these agencies including the East Bay Municipal Utilities District have been working together diligently on the Mokelumne River, and have formed an scientific and technical group known as the Mokelumne River Technical Committee, whose purpose is to provide an forum for the exchange of information and data on the Mokelumne River for the improvement of salmon and steelhead populations. Woodbridge Irrigation District is a member and a participant in programs to study and improve the fishery and its habitat. Studies on the Mokelumne River are not yet conclusive enough to justify any transfer or limitation of water rights for supposed fishery benefits, and more work is needed before hypothesis can be confirmed or denied. The lack of good hard science and technical data in Mokelumne River system limits the ability to reach any valid conclusions, and does not justify any proposal to increase flows or to alter flows as a benefit to the salmon fishery on the Mokelumne River.

IX-12. - 9. Gravel Replacement Projects. Gravel Replacement Projects are an important part of the restoration of the Salmon fishery. Good spawning gravels are so limited on the Mokelumne River that natural spawning salmon are frequently forced to spawn in riffles and gravels forming their redds on top of existing redds, which results in the loss of eggs. Of 770 salmon redds counted in 1994, 107 or 14% were superimposed (on top of) other redds by 50% of the amount of the redd or greater (EBMUD 1995). Higher numbers of naturally spawning salmon could only suggest the greater need for improvement of existing gravels or the creation of new gravels.

IX-14. - 13. Temperature Control. Water temperature is a key factor and should be monitored at the appropriate points. On the Mokelumne River, the SWRCB should consider the United States Geological Service at the Woodbridge Golf Course at Woodbridge as the appropriate point for setting temperature standards in the Mokelumne.

X-3. - 2. Agricultural Water Conservation. Conservation of surface and groundwater supplies is already a vital part of management of this area's limited water resources. The

Woodbridge Irrigation District has adopted an AB 3030 plan with the initial goal of gathering information and assessing problems associated with declining groundwater levels. Area growers have been practicing conservation with the installation of drip irrigation for vines and orchards. Also growers of row and garden crops have employed minimum water use practices limiting the amount of evaporation and transpiration. The Woodbridge Irrigation District also adopted a Agricultural Water Management Planning Act Report (dated June 14, 1994) that concluded that the District was practicing sound water conservation principles in its delivery and management of surface water supplies, and that the District would continue to pursue opportunities to conserve water consistent with the existing operations.

X-7. - C. Water Transfers. Water transfers involving the use of the State and Federal Delta pumps will reduce the available supply for Delta outflow. Most large water transfers have occurred via export utilizing the State and Federal projects, and have a deleterious effect on outflow and cannot be construed as bridging the gap between supply and demand. Water transfers and sales have increased the reliance on ground water and have resulted in land fallowing, which adversely affects the local economies. Much of the water available for transfer was actually available and being used by the local environment prior to export. Groundwater basins cannot be counted on to make up for the shortfall of environmental and agricultural water needs.

XII-12. - b. Employment Impacts. The employment impacts resulting from the reduction of water within the San Joaquin County area will not be short-term but long term, because agriculture will have to adapt to reduced supplies of water, which in many cases may mean that land will go unfarmed or fallowed. Of the 823,729 acres of land in farms in San Joaquin County according to the 1993 Agricultural Report, only 448,511 acres were irrigated. Dairies and milk production accounted for the highest single dollar value crop at \$169,457,000, depending on forage crops, corn and grain crops as a vital part of their production. Dairies are a large employer, a large user of services and supplies from local communities. Reductions in dairy herds would provide long term unemployment impacts not accurately depicted in Table XII-4., on pp. XII-12. and XIII.

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WOODBIDGE IRRIGATION DISTRICT

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