



San Joaquin River Group

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Phil Isenberg
Chairman, Delta Vision Blue Ribbon Task Force
650 Capitol Mall
Sacramento, CA 95814

September 8, 2008

Re: Third Draft Strategic Plan

Dear Chairman Isenberg:

These comments are submitted on behalf of the SJRGA.

“Because groundwater is used to replace much of the shortfall in surface water supplies, water deliveries reductions from the flow alternatives would increase groundwater overdraft in the Central Valley by increasing groundwater pumping and eliminating surface water imports as a source of recharge” FEIR for the Implementation of the 1995 Bay-Delta WQCP Volume I, November 1999, p. VI -144.

The proposed Delta Vision Plan would decimate the San Joaquin Valley. It proposes, based on a back of the envelope calculation, to release an additional 2,000,000 – 3,000,000 acre feet of surface water to the Delta. This is a region that is already water short and in groundwater overdraft.

The proposed DV plan calls for three (3) flow components from the San Joaquin River. The first and largest is maintaining positive flows on the San Joaquin River February – June. Current negative flows range from 5-7,000 February – June, excluding the VAMP pulse flow. The flow split at Old River is roughly 50/50. Thus, the upstream reservoirs would need to release 10-14,000 cfs for 120 days to maintain positive flows. This would amount to 20,000 af to 28,000 af x 120 days or 2,400,000 af to 3,360,000 af.

By comparison the VAMP Pulse Flow has an added maximum release of 110,000 af.

The Plan also calls for a Delta outflow of 12-18,000 cfs. in the fall. Lets assume SJR accounts for 20% of the theoretical Delta outflow. Under the proposal this would be 2,400-3,600 of inflow. Vernalis normally runs about 1,500 cfs. This means a water cost of $900 \times 2 \times 60 = 108,000$ af to $2,100 \times 2 \times 60 = 252,000$ af.

The last flow component of 2-3,000 cfs at Vernalis for 28 days we will assume is subsumed within the Delta outflow requirement.

Total costs in additional surface water supplies to the SJR Basin would be 2,508,000 to 3,612,000 af.

This in a region already described by the SWRCB and DWR as in a perpetual overdraft of groundwater by 200,000 afa! That number is before FWUA tried to recapture or makeup for their settlement water that will now flow downstream. This is before Judge Wagner's decision, which will force more farmers to groundwater.

In addition to the water costs the Delta Vision plan also states that upstream diverters will also be charged a fee to help pay for the Delta solution. The fee allocation has not been described in detail, so it is unknown how those costs will be allocated.

An interesting exchange took place at the DV task force meeting when Mr. Isenberg asked Mr. O'Laughlin if he "believed" his upstream clients did not contribute to the problems in the Delta. Mr. O'Laughlin answered in the affirmative. One of the reasons Mr. O'Laughlin takes such a position is set out in the State Water Plan.

"In 2000, an average water year, agriculture accounted for about 57 percent of the San Joaquin River region's total developed water use, while urban water use was about 5 percent and environmental water use for dedicated purposes was 38 percent." (DWR State Water Plan p. 7-8). The SJR Basin already makes substantial surface water available for the environment.

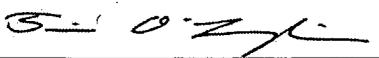
So in summary:

- The SJR Basin will forego 2-3 maf of surface water
- The water users in addition to giving flow will have to pay a Delta fee
- Groundwater overdraft will increase. The problems associated with groundwater overdraft will intensify
- The Delta vision goal of regional self-sufficiency will not be met unless DV describe sufficiency as a sustainable drought
- For all the water and all the money what do citizens in the SJR Basin gain by implementing DV
- At least in regards to the SJR the co-equal values have been totally emasculated in favor of the environment.

Finally and most importantly for all the money and all the flow no one can qualitatively or quantitatively tell us how the Delta Ecosystem will be fixed.

Very truly yours,
O'LAUGHLIN & PARIS LLP

By:



TIM O'LAUGHLIN