

From: Gfredlee@aol.com  
Date: Wed, 8 May 2002 17:16:37 EDT  
Subject: Re: Comments to DWSC Report  
To: steinerd@ix.netcom.com  
CC: Donn\_W\_Furman@ci.sf.ca.us, kjwolf@dcn.davis.ca.us

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Dan Steiner

Thank you for your comments on the preliminary draft synthesis report on the SJR DO Depletion problem in the Deep Water Ship Channel (DWSC). My responses to your comments are presented below in all caps.

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G. Fred Lee:

I have been asked by San Francisco's Office of the City Attorney to comment on your draft report. The section that I have reviewed appears at page 65 of your revised draft "SJR Water Diversions". **SOME OF THE PROBLEMS YOU HAVE REPORTED ARE RELATED TO YOUR APPARENTLY ONLY REVIEWING A SMALL PART OF THE REPORT. A MORE COMPLETE REVIEW WOULD HAVE SHOWN THAT SOME OF YOUR STATEMENTS ARE INACCURATE. THESE ISSUES ARE DISCUSSED BELOW.**

This section is currently erroneous and incomplete in its content. If the depletion of SJR flow is to be highlighted, a complete and objective discussion needs to occur. The less-than-accurate singling out of divertors lthe SJR Basin does not correctly illustrate the magnitude of the issue, nor the contributors. **PLEASE PROVIDE ME WITH YOUR "A COMPLETE AND OBJECTIVE DISCUSSION OF THE DIVERSION ISSUES. I HAVE HIGHLIGHTED WHAT I UNDERSTAND ARE THE MAJOR DIVERSIONS THAT IMPACT THE SJR FLOW THROUGH THE DWSC. ARE THERE OTHER MAJOR DIVERTERS THAT NEED TO BE ADDED TO THE REPORT? PLEASE NOTE THAT I HAVE DISCUSSED IN DETAIL MANY OF THE OTHER VALLEY FLOOR DIVERTERS IN ANOTHER SECTION OF THE REPORT.**

Regarding San Francisco diversions, your discussion mis-represents the fact that their facilities are upstream of the New Don Pedro Project. **I DID NOT SPECIFY WHERE SAN FRANCISCO DIVERSION OCCURS.**

San Francisco's operations affect runoff from the upper basin; however, the flow that ultimately goes to the Lower Tuolumne River and the San Joaquin River is regulated by New Don Pedro Reservoir, and by no means does San Francisco's operation "directly impact[s] the flow of the SJR into the DWSC."

**THIS STATEMENT THAT SAN FRANCISCO DIVERSION OF FLOW DOES NOT IMPACT THE DO IN THE DWSC IS NOT IN ACCORD WITH THE FACTS. AS DOCUMENTED IN THE REPORT, SJR FLOW THROUGH THE DWSC AFFECTS DO DEPLETION IN THE DWSC. ALL FLOW DIVERSIONS UPSTREAM OF THE DWSC THAT CONTRIBUTE TO DECREASED SJR DWSC FLOW BELOW ABOUT 2,000 CFS ARE ADVERSE TO MAINTAINING THE DO IN THE DWSC ABOVE THE WATER QUALITY OBJECTIVE.**

You have chosen to selectively illustrate several depletion-contributors within the San Joaquin Valley, in particular San Francisco and the Modesto

and Turlock Irrigation Districts. As said above, this short-list does not put into proper context the depletions in the valley. WHAT ARE THE OTHER MAJOR DIVERSIONS OF FLOW THAT SHOULD BE LISTED THAT ARE NOT LISTED IN THE REPORT?

The unimpaired flow at Vernalis is estimated to be about an annual average 6 million acre-feet. Modeling of the current level of development within the valley indicates a flow reaching Vernalis of about 2.7 million acre-feet.

I do not see the particular relevance of the data in Table 9. I have not checked the source of the data; however, I question the utility of a "April - September" analysis. I can believe a substantial reduction in runoff does occur during April through July as projects store water and direct water to depletion. However, I understand that the DO problem occurs generally from September into the late fall and early winter. How do you link the storage or depletion of water in April to low DO in the fall? IF YOU WOULD HAVE READ THE DRAFT REPORT AND THE REFERENCED BACKUP DOCUMENTS YOU WOULD HAVE LEARNED THAT YOUR UNDERSTANDING OF WHEN THE LOW-DO PROBLEM OCCURS IS INACCURATE. THERE ARE LOW DO PROBLEMS IN THE DWSC DURING ALL TIMES OF THE YEAR. THE MOST SEVERE OCCUR IN JUNE THROUGH OCTOBER. AS DOCUMENTED IN THE REPORT, IN 2001 SOME OF THE MOST SEVERE DO DEPLETION PROBLEMS OCCURRED IN JUNE. FLOW DIVERSIONS IN MAY THROUGH OCTOBER ARE IN GENERAL ADVERSE TO THE LOW DO PROBLEM IN THE DWSC.

You make a statement that the CVP diverts "about a million ac-ft/yr from the South Delta." This type of erroneous or mis-stated value puts to question the accuracy of the data/documents or sources upon which you are relying. I HAVE REWORDED THIS SENTENCE TO CORRECTLY STATE WHAT WAS MEANT, THAT THE UPSTREAM DIVERSIONS OF SJR FLOW INTO THE DELTA ARE ABOUT A MILLION AC-FT/YR AS SHOWN IN TABLE 9. THIS TABLE IS FROM THE WPRS (NOW THE USBR) AND SOUTH DELTA WATER AGENCY REPORT CITED IN THE FOOTNOTE TO THE TABLE AND LISTED IN THE REFERENCES.

Modeling currently indicates that CVP exports are about 2.1 MAF/yr and SWP exports are about 3.3 MAF/yr, and at times these exports will have an influence on flows from the San Joaquin River. THIS STATEMENT IS ONLY TRUE WITH RESPECT TO INFLUENCING THE SAN JOAQUIN RIVER FLOWS THAT ARE ADVERSE TO THE DO IN THE DWSC IF THE SJR FLOW IS DIVERTED INTO OLD RIVER RATHER THAN ALLOWING IT TO PASS THROUGH THE DWSC BEFORE IT IS EXPORTED TO CENTRAL AND SOUTHERN CALIFORNIA.

AS INDICATED ABOVE I AM INTERESTED IN INCLUDING ALL MAJOR DIVERTERS OF SJR WATERSHED WATERS THAT ARE RESPONSIBLE FOR LOW SJR DWSC FLOW THAT CONTRIBUTES TO THE LOW-DO PROBLEM IN THE DWSC. ANY SUGGESTIONS THAT YOU, THE CITY OF SAN FRANCISCO AND OTHERS MAY HAVE ARE WELCOME.

THANKS FOR YOUR COMMENTS. DISCUSSION OF THESE ISSUES WILL ELIMINATE SOME OF THE LACK OF UNDERSTANDING THAT YOU AND EVIDENTLY THE CITY OF SAN FRANCISCO HAS ON THE LOW-DO PROBLEM IN THE SJR DWSC.

Dan Steiner