

Delta Plan Stirs Friant Concerns

Comments Are Critical Of Environmental Study

Debate and dispute over Delta issues are nothing new and the latest Delta Plan and its draft programmatic environmental impact report (DPEIR) made public by the Delta Stewardship Council are proving to be no exception.

Numerous comments about provisions in the plan – the fifth to be drafted in the past year – have been filed with the Delta Stewardship Council. Many are negative. There is more to come.

Council members are meeting twice during February to consider public comments to help provide direction for a sixth draft plan. In the process, the proposed Delta plan has grown from 52 pages in its first version to a 468-page

fifth staff draft in August 2011. The latest DPEIR includes some 2,200 pages.

FRIANT'S 'LINK' TO THE DELTA

The Friant Water Authority and East Side agencies with Central Valley Project contracts for delivery and use of Friant Division and Cross Valley Canal water have fundamental concerns over what happens in the Delta.

Cross Valley Canal deliveries to the East Side depend directly on availability of CVP water transported through the Delta and then pumped and exported south from the CVP and State Water Project pumps near Tracy.

Friant Division contractors rely upon water pumped from the Delta and delivered down the Delta-Mendota Canal to meet irrigation demands of the San Joaquin River Exchange Contractors, the river's historic water right holders. Because of the Delta-Mendota water exchange supply, San Joaquin River water can be diverted at Friant Dam into the Madera and Friant-Kern canals.

'DOESN'T PASS MUSTER'

Jennifer Buckman, Friant Water Authority General Counsel, said in comments filed by Friant that the draft EIR's "analysis of the Delta plan's impacts simply does not pass muster under CEQA (the California Environmental Quality Act).

"The [Delta Stewardship] Council cannot adopt the draft Delta Plan until the DPEIR's very serious shortcomings are remedied. The DPEIR must be substantially revised so that it adequately analyzes the potential environmental impacts that could directly or indirectly result from implementing the Delta plan."

As an example, Buckman noted that the Delta plan says "it will incorporate and implement the Bay-Delta Conservation Plan (BDCP), a habitat conservation plan that is currently being developed under the auspices of the Endangered Species Act. The BDCP is not completed

Please see [Delta Plan](#), Page 3



Lower Tule River Irrigation District

Mike Battles (right), Operations Manager of the Lower Tule River and Pixley irrigation districts, receives the F. Gordon Johnston Award from U.S. Bureau of Reclamation Mid-Pacific Regional Director Don Glaser during a conference in Reno, Nevada.

Regional Honors

Lower Tule River, Pixley Operations Chief Presented With Water User Award

Mike Battles, Lower Tule River Irrigation District and Pixley Irrigation District Operations Manager, has received the Central Valley Project's top honor for operation and maintenance achievement.

Battles, who has served Lower Tule River and Pixley water users for the districts over the past 25 years, was presented with the F. Gordon Johnston Award for his contribution to outstanding O&M work in irrigated agriculture.

The presentation was made during the annual Mid-Pacific Region water users conference last month in Reno, Nevada. Don Glaser, U.S. Bureau of Reclamation Mid-Pacific Regional Director, made the presentation.

INTERTIE PROJECT

"The award recognized Mike for his work in the coordination and construction of the Lower Tule River Intertie Canal, a \$5 million dollar project done on-time and under budget," said Dan Vink, General Manager of the two Tulare County districts, both of which are members of the Friant Water Authority.

"The project was also built during one of the wettest winters and springs on record making the accomplishment even that much more impressive," Vink noted.

Highlights of the project include:

- More than 100,000 yards of excavated material.
- 2,000 linear feet of pipe laid ranging from 5-8 feet in diameter.

Please see [Award](#), Page 2

Dry Winter Keeps Water Supply Outlook On Low Side

U.S. Bureau of Reclamation officials are readying the Friant Division's initial water supply declaration of 2012 and it isn't likely to be much.

A significant storm brought much-needed valley rain and heavy Sierra Nevada snow, but it was the first major storm event since early October. The most recent hoped-for round of precipitation, from an upper-level low pressure system on February 7, was far more threat than wet.

National Weather Service reports show precipitation over the southern Sierra was scattered and amounted to no more than a quarter of an inch, far less in most locations. In the valley, most of the East Side did not receive enough sprinkles to settle the dust. A few hundredths of an inch fell along the West Side February 7.

NOT MUCH SNOW

San Joaquin River watershed snow

course surveys February 1 were not encouraging.

The 17 courses surveyed showed water content readings averaging only 24% of the normal for April 1, the date upon which snow conditions are typically assumed to reach their seasonal peak. Long-term averages show that 65% of the snow-

pack should have accumulated by February 1.

Just two courses were found to have water contents of 10 or more inches. They were Kaiser Pass (10.7 inches), at 9,000 feet northeast of Huntington Lake; and Piute Pass (10.0 inches), at 11,300 feet east of Edison Lake.

Only three locations had three or more feet of snow on the ground. The most measured was 45 inches atop Kaiser Pass.

Manual and electronic readings record the snowpack's statewide water content at only 37% of normal for early February, according to the California Department of

Please see [Dry Winter](#), back page

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FRIANT Waterline

February 2012
Page 2

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CROSS VALLEY CANAL

Bureau Moves Ahead On Interim Contracts

The U.S. Bureau of Reclamation and seven water providers along the Friant-Kern Canal are moving closer to enactment of Cross Valley Canal interim renewal contracts.

In late December, Reclamation released a draft environmental assessment and finding of no significant impact.

The finding covers execution of the interim renewal contracts with the seven Central Valley Project Cross Valley contractors as well as approval of water exchange arrangements.

The Cross Valley contractors use the Cross Valley Canal in Kern County to obtain water supplies from the Delta.

They include Fresno County, the Hills Valley Irrigation District, Kern-Tulare Water District, Lower Tule River Irrigation District, Pixley Irrigation District, Tri-Valley Water District and Tulare County.

Renewal will be for up to two years.

Cross Valley contractors have agreements with Reclamation separate from those among CVP-Friant Division districts, most of which have been converted to permanent contracts as a result of repayment by Friant districts of capital owed the federal government for CVP development and construction.

The Friant repayment contracts were authorized under federal legislation enabling provisions of the San Joaquin River Restoration Settlement.

CALIFORNIA LEGISLATURE Bond Measure Being Discussed

A great deal of discussion has been occurring in the State Capitol but no firm proposals have been made on whether an \$11.1 billion water bond measure should be changed, delayed or left on the November ballot.

There had been indications some that the Brown administration and the Legislature might seek to significantly trim the proposed bond or remove it from this



The Cross Valley Canal in Kern County

year's ballot because of the state's financial condition.

Others have remained adamant that water, storage and infrastructure repair needs will continue to mount and must be addressed to meet present and future water demands.

The bond would include funding of public benefits associated with new surface water storage facilities, one of which could be the proposed Temperance Flat Reservoir on the San Joaquin River above Friant Dam.

NATIONAL RESEARCH COUNCIL Reclaimed Water Use Is Backed

Reclaimed wastewater use could safely increase water supply availability, according to a study released January 10 by the National Research Council.

The study looked at treatment and possible re-use of approximately 12 billion gallons of U.S. wastewater that flow into coastal rivers and the ocean daily. That is equivalent to 6% of daily U.S. water usage.

The study concludes that health risks are comparable or even lower than those from regular water supplies.

Southern California water agencies helped sponsor the study.

PACIFIC INSTITUTE Conservation Is Again Touted

A Bay Area environmental organization, the Pacific Institute, is again hyping conservation as "the largest, least expensive and most environmentally sound source of new water."

Its newest study contends water is being wasted in every sector of California's economy. The Oakland-based organization has criticized irrigated agriculture for years but this time focused more on urban areas in concluding new water projects are not needed.

"We've found that California can cut its urban water use by a third through efficient technology, simple changes in policy and improved public education," said Dr. Peter H. Gleick, Pacific Institute President.

"What this means is that we can avoid new, expensive and environmentally destructive water projects and still meet California's future needs—even if California's population and economy grow as expected."

The report said outdoor water use accounts for 42% of California's urban use but regional use varies significantly.

In response, the California Farm Water Coalition noted that the state Department of Water Resources' water plan acknowledges agriculture is not the largest user of available water.

DWR cites water use in California as environmental, 48%; agricultural, 41%; and urban, 11%.

"While agricultural and urban users must comply with water management planning requirements, there are no such requirements for managed environmental flows," a Coalition statement said.

"If Peter Gleick is right we should also be measuring and managing the 48% of the available water that goes to the environment."

WATER EDUCATION FOUNDATION Water 'Basics' Course Is Offered

A day-and-a-half course on California water basics and water district board governance will be held February 23-24 on the University of California, Davis campus, sponsored by the Water Education Foundation.

First-day speakers will discuss California's water rights system and governing laws, state politics and water, Delta water issues, water quality, California's natural water environment, water demand and uses, water management issues and the legal and institutional management framework of water.

The second day will feature a governance primer for water district directors, including board member roles and responsibilities, legal requirements and points on understanding the news media.

Cost is \$250 and includes educational materials, coffee breaks, lunch on February 23 and a graduation certificate upon course completion. Scholarships are available on a case-by-case basis.

Contact the Water Education Foundation for more information at (916) 444-6240 or feedback@watereducation.org.

SACRAMENTO RIVER Red Bluff Fish Project Advances

A key milestone has been reached in the Red Bluff Fish Passage Improvement Project.

The first of nine pumps has been installed in a new pump station.

When finished, the pumps will be able to move up to 2,000 cubic feet per second from the Sacramento River into the Tehama-Colusa Canal.

The project is a joint effort by the U.S. Bureau of Reclamation and Tehama-Colusa Canal Authority.

It is the culmination of over 40 years of efforts by various entities to find a balanced solution to improve fish passage and reliability of irrigation water deliveries.

Award: Mike Battles

Continued from front page

- 30,000 man hours worked by district crews.
- More than 1,000 yards of concrete poured.

'WHO'S WHO'

Vink noted that "past winners of the award make up a list of who's who in California's irrigated agricultural community." Just a year ago, the award was presented to Aaron Fukuda, engineer of the neighboring Tulare Irrigation District. "The district thanks Mike for his loyalty and hard work and congratulates him on winning the award," said Vink.

Westlands Files \$1 Billion Suit

A West Side issue that has been litigated for decades is the focus of a \$1 billion dollar lawsuit.

Westlands Water District filed the action in the U.S. Court of Claims seeking damages from the United States for the Interior Department's alleged failure to make good on a court-ordered solution to the district's drainage problems.

Westlands leaders said they were tired of waiting on the Interior Department to get a cleanup program in place, noting that salty irrigation water below ground level is causing irreparable harm even though the district has long paid for drainage service. The United States is obligated to resolve the drainage problem under a federal law enacted many decades ago and upheld some 12 years ago in an appeals court.

SAN JOAQUIN RIVER AND RESERVOIR WATER CONDITIONS

WATERSHED PRECIPITATION

Inches	2011-12	2010-2011	Season Avg.
	Including Feb. 8	Including Feb. 9	
Huntington Lake.....	11.97	35.45	29.60
Bass Lake.....	10.70	29.07	27.98
Friant.....	4.24	15.26	9.98

SEASONAL RUNOFF

Acre-Feet	In 2011-12	Predicted	Prev. Year
Feb. (8 th).....	7,200	50,000	26,920
April-July period...			2,243,065
Water Year.....	141,588		517,309

2010-2011 Total (October 1-September 30) — 3,300,750

FLOWS

San Joaquin River

Cubic Feet Per Second	Feb. 8		Feb. 9, 2011
	Feb. 8	Feb. 9	
Calculated Natural Flow (Friant).....	239		1,823
Actual Millerton Lake Inflow.....	445		1,207
Actual Flow At Friant.....	350		201
Flow at Gravelly Ford.....	180		
Flow below Mendota Dam.....	510		
Flow at Vernalis (San Joaquin County).....	1,642		
Total Delta inflow.....	15,461		
Delta outflow index.....	9,376		

Diversions at Friant Dam

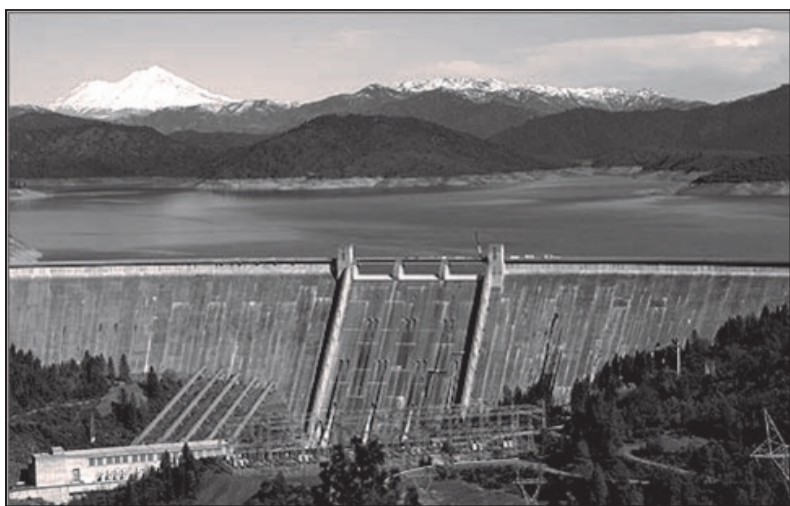
Friant-Kern Canal.....	517	1,114
Madera Canal.....	0	0

RESERVOIR STORAGE

Acre-Feet	Feb. 8	Last Year	Capacity
U.S. Bureau of Reclamation			
Millerton Lake.....	313,580	407,950	520,500
Southern California Edison Company			
Edison Lake.....	82,523	67,028	125,000
Florence Lake.....	29,457	31,819	64,400
Huntington Lake.....	68,458	61,382	89,000
Shaver Lake.....	45	50,887	135,300
Mammoth Pool.....	57,690	80,177	122,000
Redinger Lake.....	25,063	23,935	26,120
Pacific Gas and Electric Company			
Bass Lake.....	16,876	20,707	35,000*
Kerckhoff Lake.....	3,557	3,523	4,200
*Temporary capacity pending Crane Valley Dam seismic retrofit			
Upstream Total.....	283,689	339,458	611,400
OVERALL.....	597,269	747,408	1,131,900

OTHER SOUTH VALLEY DAMS AND RESERVOIRS

Acre-Feet	Feb. 8	Capacity
Chowchilla River / Buchanan.....		
102,557		150,000
Fresno River / Hidden.....		
32,839		90,000
Merced River / New Exchequer.....		
662,818		1,024,600
Kings River / Pine Flat.....		
589,022		1,000,000
Wishon, Courtright lakes total.....		
129,920		251,900
Kaweah River / Terminus.....		
30,734		185,600
Tule River / Success.....		
21,284		40,000*
*Capacity for emergency flood control, 82,314 acre-feet.		
Kern River / Isabella.....		
170,418		360,000*
*Capacity for emergency flood control, 570,000 acre-feet.		
San Luis Reservoir / CVP.....		
908,173		980,000
State Water Project portion.....		
997,717		1,060,000
San Luis Reservoir total.....		
1,905,890		2,040,000



Shasta Dam

Enlarged Shasta Gets Study Nod

The Central Valley Project's largest reservoir could eventually become a lot bigger. A U.S. Bureau of Reclamation draft feasibility report and preliminary draft environmental impact statement have determined that the long-proposed \$1.07 billion plan to raise Shasta Dam by 18½ feet is feasible and economically justifiable.

The increase would boost Lake Shasta storage by 634,000 acre-feet, or some 14%. Shasta Dam, on the upper Sacramento River nine miles northwest of Redding, is now 602 feet high and can store 4,550,000 acre-feet. Shasta and Friant dams, both completed in the early 1940s, were the main water storage features of initial Central Valley Project development. Shasta Dam was developed for flood control, irrigation water supply, municipal and industrial water supply, hydropower generation, fish and wildlife conservation and navigation purposes.

PROJECT BENEFITS

The increased storage would benefit agricultural and municipal water users in much of the state, according to the Shasta Lake Water Resources Investigation draft feasibility report, and would also benefit salmon and steelhead trout that migrate up the river by providing a more reliable supply of cold water for spawning.

There would need to be some relocation of structures and roads but Interstate 5 would not be affected. "Although higher dam raises are technically feasible, 18½ feet is the largest dam raise that would avoid extensive and costly relocations, including moving the Pit River Bridge and Interstate 5," the report said. Any project is years from approval or construction. "We have a long way to go, bottom line," said Bureau public affairs spokesman Pete Lucero.

FISH AND GAME COMMISSION

Limit Increase For Striped Bass Nixed

Non-native striped bass, perhaps the most voracious species feasting upon Northern California salmon and steelhead in the Delta, have been handed a pass by a state agency.

California Fish and Game Commission members have turned down a proposal to increase fishing limits on strippers in order to protect native fish.

ANGLERS DELIGHTED

Sport fishing groups were delighted with the decision.

Anglers, many of whom find striped bass one of the biggest and best sportfishing challenges, had lobbied for months to make no change in fishing limits.

Hundreds attended the Commission hearing.

Commission members agreed with their position unanimously and rejected the proposal to increase striped bass limits threefold.

SETTLEMENT OUTCOME

The change was an outcome of a federal litigation settlement last year.

The Coalition for a Sustainable Delta contended California Department of Fish and Game limits on the invasive species permitted striped bass to proliferate, frequently using endangered species such as salmon and steelhead as meals. Declines of other Delta species were also attributed to strippers.

After the plaintiffs and CDFG reached a settlement, in which the state admitted no fault, federal fishery agencies recommended the changes that the Fish and Game Commission has now rejected.

Sportfishing groups were outraged by the settlement and contended striped bass, Chinook salmon, steelhead and Delta smelt successfully shared the rivers since strippers were intentionally introduced in the Delta in the 1880s.



Striped bass: A new lease on Delta life.

"This is great victory for Northern California, its water, ecosystem and species," Victor Gonella, Golden Gate Salmon Association (GGSA) President, said. The group submitted an alternate proposal to the DFG plan focusing on reducing export pumping of Delta water into the Delta-Mendota Canal and California Aqueduct.

"We believe a yes vote is justified," CDFG Director Chuck Bonham testified. "Striped bass predation is not the only factor or even the most significant factor in the decline of salmon and other listed species but any angler who fishes for strippers sees how they predate on salmon."

MORE LITIGATION

Michael Boccadoro of the Dolphin Group, a spokesman for the Coalition for a Sustainable Delta, said the decision guarantees there will be renewed litigation in federal court.

Striped bass are among more than three dozen Delta stressors other than the state and federal water export pumps that negatively impact other Delta fish species.

A few other stressors include wastewater discharges from the Sacramento Regional Wastewater Treatment Facility, unscreened diversions in the Delta and other water quality problems.

Other Water Interests Criticize Delta EIR

There have been large numbers of comments filed over the Delta Stewardship Council's latest draft Delta plan and draft preliminary environmental impact report (DPEIR) and among the most critical from water agencies are responses by interests of which the Friant Water Authority is a part.

The Association of California Water Agencies (ACWA), on behalf of an ag-urban coalition, told the Delta Stewardship Council that the ag-urban coalition's previously-submitted alternate plan has been mischaracterized significantly by the DPEIR and is not correctly evaluated as an alternative.

FRIANT INVOLVED

The Friant Water Authority is an ACWA member and has taken part in the ag-urban coalition's many discussions and communications to the Council on the Delta plan.

Friant Water Authority Water Resources Manager Stephen Ottemoeller said, "The ag-urban coalition has been working extensively with Stewardship Council members and staff to achieve a Delta plan that is capable of meeting the co-equal goals and will continue to do so as the Council works to finalize the plan later this year."

"The coalition has serious concerns with the [DPEIR]," wrote ACWA Executive Director Timothy Quinn. He said ACWA's analysis shows the draft Delta Plan "is so flawed that the DPEIR cannot provide a legally adequate basis for the [Stewardship] Council to consider adopting that draft plan."

CO-EQUAL GOALS MANDATE

The ag-urban coalition focused its comments primarily on the DPEIR's failure to provide analysis of how the

Delta plan would meet the co-equal goals defined by enabling state legislation of "providing a more reliable water supply for the state of California and protecting, restoring and enhancing the Delta ecosystem."

Quinn said the Coalition's alternate plan would provide an efficient means to advance the co-equal goals but since it is not adequately evaluated by the DPEIR, "the

Please see **Comments**, back page

Delta Plan: Friant Files Numerous Concerns

Continued from front page

and has not been approved, and its EIR has not been certified. Incomplete future programs and their environmental documents cannot be incorporated into an EIR by reference."

Some of Friant's other concerns:

- The DPEIR fails to disclose and analyze the reasonably foreseeable environmental impacts that will result from implementing the program. Buckman said the programmatic environmental document must provide at least some general analysis of "the plan's potential reduction in water supplies and the associated environmental impacts." She pointed out that the draft EIR "impermissibly seeks to shift the burden of analyzing the impacts associated with ob-

taining water sources from the [Stewardship] Council to the local agencies that will suffer the impacts."

- The DPEIR lacks feasible mitigation measures to mitigate the Delta plan's environmental impacts.
- It does not evaluate how the Delta project and alternatives would accomplish the program's two fundamental objectives, maintaining the health of the Delta ecosystem and providing a safe and reliable water supply for those who are dependent on the Delta. Buckman explains that the DPEIR must evaluate the proposed program actions to determine how well each of them satisfies these statutorily-defined objectives. "It is impossible to

determine whether the EIR satisfies its legal mandate of evaluating a reasonable range of feasible alternatives when the EIR makes no attempt to analyze whether any of the alternatives meet the project objectives," Buckman wrote.

- The DPEIR conclusion's "that the draft Delta plan is environmentally superior to the alternatives is arbitrary and capricious." Buckman asserted, "The omission of this analysis renders the DPEIR's alternatives analysis fatally defective...when the DPEIR readily acknowledges that no attempt has been made to discern whether the Delta plan meets the project objectives or is feasible to implement."

Dry Winter: Storage Is Very Good

Continued from front page

Water Resources. That is just 23% of the average April 1 reading.

GLOOMY RUNOFF OUTLOOK

The California Department of Water Resources' first runoff issued February 8 reflects the paltry snowpack.

Assuming normal precipitation occurs for the balance of spring, DWR estimates the San Joaquin River would generate 750,000 acre-feet of runoff during the peak April-July season, 60% of average.

Its worst-case (90% exceedance, or (likelihood)) forecast predicts April-July runoff of just 340,000 acre-feet, 27% of average.

Snow Course Measurements				
January 24-February 1, 2012				
COURSE	ELEVATION	SNOW DEPTH	WATER CONTENT	PCT. OF APRIL 1 AVG.
Mono Pass	11,450	33.2"	7.2"	23%
Piute Pass	11,300	37.1"	10.0"	26%
Pioneer Basin	10,400	42.6"	8.9"	26%
Heart Lake	10,100	34.7"	7.6"	27%
Rose Marie	10,000	31.9"	7.9"	27%
Agnew Pass	9,450	25.6"	6.6"	21%
Kaiser Pass	9,100	45.6"	10.7"	27%
Dutch Lake	9,100	33.1"	6.9"	25%
Badger Flat	8,300	33.7"	8.7"	28%
Nellie Lake	8,000	33.7"	8.4"	23%
Edison Lake	7,800	20.9"	4.0"	27%
Chilkoot Lake	7,450	16.6"	6.2"	17%
Tamarack Creek	7,250	19.6"	5.2"	22%
Florence Lake	7,200	10.3"	1.8"	23%
Chilkoot Meadow	7,150	23.1"	7.8"	21%
Huntington Lake	7,000	20.8"	4.3"	23%
Poison Meadow	6,800	13.7"	5.1"	21%
Basin Average Percent of April 1 Normal				24%

Long-range weather forecasts are not encouraging. The National Weather Service's three-month outlook for the southern Sierra and San Joaquin Valley calls for below-average precipitation with drought conditions developing or persisting.

LOW DECLARATION?

With conditions so dry, Friant Division water agencies were expecting a low initial Bureau of Reclamation water supply declaration (after press time) on February 15 for the Central Valley Project contract year that begins March 1.

The Class 1 (firm) contract supply is expected to initially be 50% or less, with no Class 2 water at all based on a preliminary late January analysis by Reclamation using a 90% exceedance (likelihood) factor. Unfortunately, with little to no precipitation since that analysis, this year is bucking the odds and falling short of even that conservative forecast.

Under Friant's unique two-class system, the 1.4 million acre-feet of Class 2 water under contract does not begin to become available until the Bureau of Reclamation determines all 800,000 acre-feet of Class 1 water can be delivered. Class 1 contracts for the most part are held by districts with limited access to alternative surface water or groundwater supplies.

STORAGE LEVELS GOOD

One bright spot in the supply picture, not only for Friant water providers but for users in other parts of the valley and state, concerns current reservoir storage.

Since last year's supply was so much in excess of average, storage in the Friant Division's Millerton Lake on the San Joaquin River as well as some of the upper river's hydroelectric reservoirs is above normal for this time of year.

In part, that is due to an estimated 100,000 acre-feet of "carryover" water

from last year which may be unprecedented given Millerton Lake's limited storage capabilities. That carryover water will be critical in meeting water demands for the forthcoming year.

Millerton Lake storage at midnight February 7 was 313,580 acre-feet, 60% of capacity. The lake is falling slowly. The Friant-Kern Canal on February 8 was meeting light user demands with a Friant Dam release of 517 cubic feet per second with no water in the Madera Canal. A considerable amount of frost protection water was delivered during the winter.

The San Joaquin River's calculated natural flow at Friant as if there were no dams) has been very low most of the winter. It had a brief bump up to more than 3,200 c.f.s. in the January 21 storm but has steadily declined since, dipping to a summer-like 235 c.f.s. on February 7.

Four of the five major Southern California Edison Company power reservoirs in the Big Creek system have storage that is greater than typical for early February, although Shaver Lake remains empty for dam maintenance.

STATEWIDE

Statewide, the picture is similar. "So far, we just haven't received a decent number of winter storms," said Department of Water Resources Director Mark Cowin. "We have good reservoir storage thanks to wet conditions last year, but we also need more rain and snow this winter."

Lake Oroville in Butte County, the State Water Project's principal storage reservoir, is at 107% of average for the date (72% of its 3.5 million acre-foot capacity). Lake Shasta north of Redding, the federal Central Valley Project's largest reservoir with a capacity of 4.5 million acre-feet, is at 99% of its normal storage level for the date (68% of capacity).

San Luis Reservoir in Merced County, an important off-stream storage reservoir south of the Delta, is at 119% of average for the date (95% of its capacity of 2,027,840 acre-feet). San Luis is a critically important source of water for both the State Water Project and Central Valley Project when pumping from the Delta is restricted or interrupted.

CVP OUTLOOK

Around the CVP, although precipitation for water year 2011-12 has been marginal, the final snow-water content statewide for 2011 was a near-record 152% of the seasonal average.

As a result, the CVP's carryover storage into WY 2012 was the third-highest on record at 9.3 million acre-feet.

The Bureau of Reclamation said that with two months remaining in California's traditional "rain season," it anticipates that precipitation totals will improve.

"For water year 2012, Reclamation will focus on stretching water supplies, moving water where it is most needed, providing as much certainty as possible for growers and continuing to build and foster long-term water solutions in partnership with the state."



A Canal Project To Combat Erosion

Friant Water Authority
An unlined Friant-Kern Canal section along Lake Woollomes, the canal's re-regulating reservoir southeast of Delano, has received 8,000 tons of rip-rap material on its inside banks to protect the canal from erosion due to currents and wave action. Similar work is being done on the reservoir's inside embankments.

Comments: Delta Plan's DPEIR

Continued from Page 3

Council has little grounds for assessing the merits of the proposed project or the alternatives."

ACWA's comments assert the DPEIR "does not provide any in-depth, quantifiable environmental analysis of the proposed project" and contends the study "must give sufficient consideration to potential environmental impacts outside the Delta associated with the activities contained in the proposed project and the alternatives."

That includes analysis of a proposed Delta plan policy that the State Water Resources Control Board accelerate adoption of new flow objectives and criteria to implement a "more natural flow regime." Such evaluation is lacking, Quinn said.

"Millions of dollars have been invested outside the Delta to improve aquatic habitat..." he said. "The [DPEIR] contains no discussion as to the potential adverse impacts of a 'more natural flow regime' on critical aquatic habitat characteristics outside the Delta that may result from a significant increase in flows for the Delta and an asserted need to concurrently reduce the availability of export supplies."

REJECTION URGED

The San Joaquin River Group Authority (SJRG), of which the Friant Water Authority is a member, also urged rejection of the DPEIR.

Writing for the SJRG, attorney Valerie C. Kincaid of the firm of O'Laughlin and Paris said the DPEIR leaves several crucial terms and phrases undefined, "leaving true environmental implications resulting from the proposed plan undeterminable."

One of these, she said, is the term "natural flow regime," which Kincaid noted "is a fundamental element of the

plan" and Delta restoration. "It is uncertain how much water would be necessary to 'make up' for reductions in water as a result of a more 'natural flow regime,'" she said. "Without knowing what is considered 'natural flow' it is impossible to analyze any impacts resulting from restoration of 'natural flow' and understand why establishment of a 'natural flow regime' is preferable to any alternative."

DEFINITIONS LACKING

The SJRG comments also complain that there is no definition for the frequently used terms "Delta water" and "Delta water users" or what they are supposed to represent. The DPEIR is much too vague, Kincaid added, and fails to analyze "potential impacts of the suggested 'variety of actions'" and how they would provide benefits.

Nor is there any firm word in the DPEIR on "how much water it will take for suggested actions to make up the Delta water supply reduction." Program deadlines "have been seriously questioned as unrealistic at several [Delta Stewardship Council] meetings, yet the DPEIR assumes these are realistic measures and misrepresents the feasibility of their achievement."

The SJRG also contends the latest Delta plan's mitigation measures could result in unconsidered impacts that have not been evaluated in the DPEIR; the SJRG expressed particular concerns about as-yet-undefined water supply reliability and availability.

It further asserts, "The DPEIR relies on multiple EIRs for wholly unrelated projects... Relying on projects from different geographic locations for different objectives creates suspicion that the DPEIR does not analyze the true impacts from the plan."

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