

## **Farming impacts: increased salinity in the Delta**

### **1. Local Agencies of the North Delta (LAND)**

2015 comments on the BDCP/WaterFix

*Complete document here:*

<http://restorethedelta.org/wp-content/uploads/2015/11/LAND-WaterFix-Alt.-4A-Cmnt-Ltr-10.30.15.pdf>

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RDEIR/S Section 4.3.10/DEIR/S Chapter 14 - **Agricultural Resources**

#### **Water Quality Impacts**

LAND previously provided detailed comments on the agricultural impacts of Alt. 4. Even with the significant reduction in habitat creation, impacts on agricultural resources in and near the Delta will be massive. Impacts stem from converting farmland for project facilities (3,909 acres Important Farmland), degradation of surface and groundwater supplies, changing of local water levels, disruption of farms and farm access, and interference with farm infrastructure, among other impacts. Construction impacts will occur over an estimated 14-year period.

With respect to water quality impacts, the RDEIR/S discloses that salinity would be significantly higher and exceed the standard on twice as many days as without the project. (RDEIR, App. A, p. 14-17 (14% of days exceeded under Not Action Alt. increasing to 28-29% of the days).) The new analysis of Alt. 4A indicates a 5% increase in salinity from existing conditions at the Emmaton compliance point, concluding that water quality impacts are less than significant with implementation of mitigation. (RDEIR/S, p. 4.3.10-4.) As discussed above and in other comments, the RDEIR/S continues to rely on faulty modeling of water quality impacts and cannot be relied upon. Lead Agencies LAND Comments October 30, 2015 Page 23 of 33 The faulty mitigation measures to address impacts to agriculture remain largely the same as the DEIR/S, and do not meet minimum standards, including those pertaining to specificity, enforceability and effectiveness.

In any case, the project will clearly bring more salt water into the north Delta, which has historically had very high quality water. The RDEIR/S indicates that changes in water quality “could be addressed with real time operations of the SWP and CVP.” (App. A, p. 14-18.) LAND is not aware of any history of the SWP and CVP reducing water diversions without a clear requirement to do so; this year, the CVP and SWP continued to exceed even the relaxed water quality standards that applied as a result of SWRCB Temporary Urgency Change Permit processes.

### **2. Tim Stroshane, Policy Analyst, Restore the Delta**

Water Quality Impacts of the Delta Tunnels Project

*Complete document here:*

<http://restorethedelta.org/wp-content/uploads/2015/08/Water-Quality-with-Tunnels-Report-Stroshane.pdf>

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## **Salinity**

The Delta Tunnels will more than triple spikes in excess of salinity objectives along the Sacramento River downstream of the Tunnels, and along the San Joaquin River at Prisoners Point. **Outright violations of salinity objectives are expected to more than double with the Tunnels in place.** These violations will degrade water quality for Delta agriculture and for fish and wildlife beneficial uses. **Along the lower Sacramento River, salinity violations will more than double, and will occur about a quarter of the time that salinity objectives are in effect, up from about 11 percent of the time now and with the Delta Tunnels in place.** These conditions will worsen relative to current and future conditions between May and September, especially in drought years (which are expected to increase in frequency). Interior Delta salinity will also worsen between March and September (such as along the South Mokelumne River and at San Andreas Landing on the San Joaquin), as well as between February and June at Prisoners Point along the San Joaquin.