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VIA FACSIMILE

December 23, 2004

Mr. Joe Thompson
United States Bureau of Reclamation
South-Central California Area Office
1243 North Street
Fresno, California 93721

Re: The West Side Irrigation District/CVP Contract

Dear Mr. Thompson:

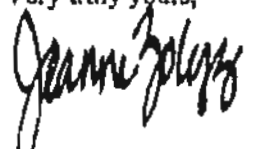
On behalf of The West Side Irrigation District, I offer the following two comments on the DRAFT Environmental Assessment Long-Term Contract Renewal for the Delta-Mendota Canal Unit dated November 2004.

At page 3/23 of the EA, the last sentence of the first paragraph under the heading: **Use of Other Available Water Supplies** reads: "Because of its degraded quality and reliability, San Joaquin River water is only used as a supplement when CVP water supplies are insufficient to meet demand." This is actually inaccurate, and should be re-written as follows: "San Joaquin River water is used as the District's main supply, with CVP water supplies being used as a supplement during peak periods or when needed to improve water quality."

The last sentence in the first paragraph on page 3-24 reads: "Tailwater is also received from Plain View Water District and recirculated into the district's system." At this time there is too little drainage water received from neighboring districts to even mention, and it would be most appropriate to delete this sentence. However, if you wish to leave it in, I would suggest the following revision: "Minor amounts of tailwater may be received into district facilities from Plain View Water District and Byron Bethany Irrigation District."

Thank you for your attention to these changes.

Very truly yours,



JEANNE M. ZOLEZZI
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cc: Ms. Barbara Kleinert, The West Side Irrigation District

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subsidence. Shallow aquifers have been contaminated by years of irrigation in the valley. The application of pesticides and herbicides and the increased solubility of naturally occurring trace elements in the soil, including selenium, boron, and arsenic, contribute to groundwater contamination.

The CVPLA PEIS developed estimates of maximum water contract deliveries for the year 2026 (Reclamation and Service 1999). These estimates were based on previous use, existing contract amount, and appropriate general plan environmental documentation relevant to CVP water use. The estimates for the two types of contracts, depending on the type of service, include the following:

- **Agricultural Water Service Contracts:** The maximum annual use between 1980 and 1993 or the projected use as addressed in the appropriate environmental documentation, limited by the maximum contract amount.
- **Water Rights and Exchange Contractors:** The maximum annual use between 1980 and 1993 or projected use as addressed in relevant environmental documentation, limited by the maximum contract amount.
- **M&I Water Service Contracts:** Total demand based on 2020 demands in DWR Bulletin 160-93 (DWR 1994) or the current M&I shortage criteria. Since 1991, Reclamation has been attempting to develop an M&I shortage policy applicable to as many CVP contractors as possible. Current M&I shortage criteria are detailed in the CVP Draft M&I Water Shortage Policy (Reclamation 2001f).

WATER QUALITY

Surface water quality in the San Joaquin River Basin ^{and dams on other tributaries} is affected by many factors, most notably, the upstream development of Friant Dam, which has withheld most of the natural flow of the river, except during flood conditions. Other factors affecting San Joaquin River surface water quality include natural runoff, agricultural return flows, biostimulation, construction, logging, grazing, operations of flow-regulating facilities, urbanization, and recreation. In addition, irrigated crops grown in the western portion of the San Joaquin Valley have accelerated the leaching of minerals from soils, altering water quality conditions in the San Joaquin River system.

In the western part of the San Joaquin Valley, soils are derived mainly from the marine sediments that make up the Coast Range and are high in salts and trace elements such as selenium, molybdenum, arsenic, and boron. As a result of extensive land development in the San Joaquin Valley, erosion and drainage patterns have been altered, thereby