

June 22, 2015

VIA ELECTRONIC MAIL

Central Valley Regional Water Quality Control Board
Attention: Ms. Margaret Wong
11020 Sun Center Drive, #200
Rancho Cordova, California 95670-6114
E-mail: margaret.wong@waterboards.ca.gov

Re: Proposed Waste Discharge Requirements for the Grassland Bypass Project

Dear Ms. Wong:

The following comments are submitted on behalf of Stockton East Water District (District) to the Central Valley Regional Water Quality Control Board (Central Valley Board) Proposed Waste Discharge Requirements (Proposed WDRs) for the Grassland Bypass Project. The District continues to be very concerned regarding the high salinity concentrations that are discharged into the San Joaquin River from the Grassland Bypass Project. Both the Proposed WDRs and Attachment A repeatedly acknowledge the high salinity concentration in the drainage which undoubtedly contributes to violations of the salinity objective at Vernalis on the San Joaquin River. However, none of the Proposed WDR documents discuss this issue.

The District asserts at a minimum the following issues be addressed before the Proposed WDRs are considered for approval by the Central Valley Board:

- A discussion should be added regarding how the discharges from the Grasslands Bypass Project effect salinity concentrations downstream on the San Joaquin River and how these discharges may or may not trigger the need for Reclamation to increase New Melones releases on the Stanislaus river to "dilute" the pollution coming from this area or otherwise provide mitigation.
- Monthly and annual salt load limits should be included in the Proposed WDRs so they are enforceable by the Central Valley Board. They are included in the Use Agreement for the San Luis Drain so they are appropriate for inclusion in the WDR.
- Additional Figures should be added to Attachment A similar to Figures 9, 10 and 11 which disclose the salinity concentrations at Mud Slough below the San Luis Drain, Salt Slough and also in the San Joaquin River.

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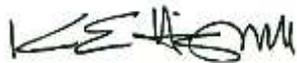
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- Any drainage management plan must specifically address how this drainage will meet the Basin Plan objectives for salinity in the San Joaquin River. While the Central Valley Board has approved a Real Time Management Program, full implementation is not expected for 10 years or more, which is well beyond the compliance schedule for the Grassland Bypass Project.

Finally, in 2016 it is anticipated that the Central Valley Board will update the Basin Plan to include salinity objectives for the entire Reach 93 on the San Joaquin River (from the Merced confluence to Vernalis). We will welcome the re-opening provided for in Section IV.1. of the Proposed WDRs to include salinity objectives and a timetable for compliance when the revisions to the Basin Plan are completed.

I appreciate the opportunity to comment on the Proposed WDRs and look forward to working with the Central Valley Board on revisions to the Proposed WDRs. Should you have any question, please feel free to contact me.

Very truly yours,



KARNA E. HARRIGFELD
Attorney-at-Law

cc: Scot A. Moody