



June 22, 2015

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Subject: Comments on the May 2015 Tentative Waste Discharge Requirements  
General Order for Growers in the Grassland Drainage Area

Dear Pamela:

Following are comments on behalf of the Grassland Basin Drainers on the Tentative Waste Discharge Requirements General Order for Growers in the Grassland Drainage Area.

We appreciate the opportunity to comment on these documents. They reflect the significant effort made by Regional Board staff to develop regulations to cover agricultural discharges to groundwater within the Grassland Drainage Area.

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Comments follow on the specific documents (page numbers refer to the non-strikeout version):

SUITE 7

WDR, Page 1, Finding 3: Insert "into" after flows in third to last sentence.

WDR, Page 3, Finding 9: Insert "and stormwater" after subsurface drainage in the first sentence.

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WDR, Page 17, paragraph IV.B.4.: Insert "(or Member representative)" after Member in the first sentence. In many cases the actual Member would not be the appropriate person to attend these meetings, and this would allow the right person to attend. It is our understanding this issue has been clarified to allow representatives to attend the outreach events in the other Irrigated Lands orders.

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WDR, Page 19, paragraph IV.C.7.: The GDA order is unique in that the third party has already been established so the 30 days from receiving an NOA is not correct because an NOA will not be issued. Table 1, page 33, states that this requirement is due 30 days after Order approval. We request 90 days for this requirement. Unlike other Irrigated Lands coalitions who already had a membership list when the new general orders were adopted, this is not the case for the Grassland Drainage Area. We

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do not have membership lists and will have to create those. This will take additional time.

WDR, Page 19, paragraph IV.C.8.: Same comments as on page 17 above, Insert “(or Member representative)” after Member in the first sentence.

WDR, Page 27, paragraph VIII.E.4.: references in the first and second sentences should be to VIII.E.1, . rather than to VIII .H.1.

WDR, Page 27, paragraph VIII.H.: The reference to the Basin Plan Amendment Workplan should be to Section IV.B. of the MRP, rather than IV.D.

Our comments, below, on Attachment A to this Order, are identical to our comment letter on the Tentative Order for the Grassland Bypass Project.

Att A, Page 4, paragraph below Table 2: The sentence should be changed as follows: “Approximately ~~10,400~~ 9,500 acres in the GDA are not irrigated.” This will then be consistent with the “\*\*” below Table 2.

Att A, Page 9, paragraph III.A.1.: sentence in paragraph just before Figure 5, the sentence should read: “The graph shows a decrease in the annual selenium loads for each water year type until 2019 when the current Use Agreement expires, and by when selenium loading must comply with the water quality objectives ~~and TMDL requirements in Mud Slough.~~” The TMDL requirements were to be met by 2005 and 2010 (see comment above on WDR Table 2). (Italics added).

Att A, Page 13, paragraph IV: sentence below Figure 6, “San Joaquin River monitoring has occurred downstream of the Mud Slough discharge (Stations H and N) to determine the GBP’s *and wetland* contribution to the river before and after the confluence with the Merced River.” (Italics added). This change is consistent with the description for Station D.

Att A, Page 15, paragraph IV.A.1: add to last sentence of paragraph, “With dry or critical years, selenium may be introduced to wetland channels from groundwater used to supplement irrigation supply *from areas outside the GDA.*” (Italics added).

Att A, Page 19, paragraph V.: the following sentence should be edited to read “To accomplish this goal, the *GDA Member Districts* and GDA growers have implemented management practices and actions to lower the selenium load discharged to the San Joaquin River.” (Italics added).

Att A, Page 20, paragraph V.C.: the following sentence should be edited to read “These lands are no longer irrigated, which ~~reduces~~ *eliminates* deep percolation *from irrigation* from these areas. *Every year additional lands may be temporarily fallowed.*” (Italics added).

Att A, Page 21, paragraph V.D.: third bullet, sentences should be changed to: “The SJRIP project also involves *aan extensive biological* contaminant monitoring program, *one component of which is* for bird eggs.”... “In line with this project, the *Member Districts and* GDA growers have tried to discourage birds from inhabiting or nesting in the SJRIP.” (Italics added).

Very truly yours,



Joseph C. McGahan  
Drainage Coordinator  
Grassland Basin Drainers