

July 7, 2014

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: Administrative Draft 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 Administrative Draft Waste Discharge Requirements (Administrative Draft WDRs) for the Grassland Bypass Project. At the outset, we are encouraged by the reduction in salt load entering the San Joaquin River from the Grassland Drainage Area from implementation of the Grasslands Bypass Project and other San Joaquin River Water Quality Improvement projects. However, we continue to be very concerned regarding the high salinity concentrations that are discharged into the San Joaquin River. Both the Administrative Draft 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 Administrative Draft WDR documents discuss this issue.

The Administrative Draft WDRs and supporting documents acknowledge that the Lower San Joaquin River is listed 303 (d) as a water quality limited segment for salinity. The Basin Plan requires by June 30, 2014 that the Grasslands Drainage Area Dischargers meet the Base Salt Load Allocations or participate in a Central Valley Water Board approved real time management program. The Dischargers have done neither. As such, it seems appropriate to address salinity in these WDRs for implementation of the Grasslands Bypass Project.

In an effort to keep these comments concise, the District suggests the following issues be addressed in any revised Draft WDRs:

- Specific identification of the numeric salinity objective (default is the Vernalis salinity objective until new site specific objectives are adopted by the Central Valley Board) must be included in any section where other constituents are

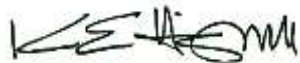
discussed (i.e., selenium, boron and molybdenum), including a compliance time schedule to achieve the salinity objectives;

- 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 Draft 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 8, 9 and 10 which disclose the salinity concentrations at Mud Slough below the San Luis Drain and also in the San Joaquin River.
- Any drainage management plan must specifically address how this drainage will meet the Basin Plan objectives for salinity in the San Joaquin River.

In addition to the issues identified above, is the Regional Board anticipating submitting the Administrative Draft WDRs to the CV Salts Technical and Policy committees for their review and input? I understand the Central Valley Board has taken the position that all things impacting salinity in the Central Valley need to go through CV Salts.

I appreciate the opportunity to comment on the Administrative Draft WDRs and look forward to working with the Central Valley Board on revisions to the Draft 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