



Pamela Creedon, Executive Officer  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive #200  
Rancho Cordova, CA. 95670-6114

Subject: Comments on Draft Waste Discharge Requirements for the Grassland Bypass Project

Dear Pamela:

Enclosed are comments on behalf of the Grassland Basin Drainers on the draft Waste Discharge Requirements.

**WDR, Findings, Page 2, No. 7:** The acreage of subsurface drains should be 33,100 not 38,700.

**WDR, Findings, Page 3, No. 13:** This Finding should acknowledge that because the implementation of the Grassland Bypass Project has led to significant reductions of selenium to the Salt Slough and the San Joaquin River, Salt Slough and the San Joaquin River below the Merced River have been de-listed on the 303(d) list for selenium.

**WDR, Findings, Page 4, No. 19:** The first sentence should be reworded to state "...discharges from the Drain have resulted in violations of these objectives."

842 SIXTH STREET

**WDR, Findings, Page 5, No. 21:** We recommend the second sentence be reworded to state that "...the discharge may be causing or has the potential to cause or contribute to the violations of water quality objectives for other constituents in Mud Slough (north) and the San Joaquin River."

SUITE 7

**WDR, Findings, Page 6, No. 31 a.:**

We recommend adding to No 31 a. "Attachment 'A' to this Order summarizes the mitigation measures and demonstrates how this Order complies with CEQA."

P.O. BOX 2157

**WDR, Findings, Page 9, No. 36:** This Finding should acknowledge that implementation of the Grassland Bypass Project has led to significant reductions of selenium discharged to Salt Slough and the San Joaquin River and that, Salt Slough and the San Joaquin River below the Merced River have been de-listed on the 303(d) list for selenium.

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**WDR, Page 15, IV.5.:** The correct name is Grassland Bypass Project (singular).

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**WDR, Page 15, V.A.:** Should be "previous 6 months" results not "quarter's".

**WDR, Page 15-16, V.E.:** Suggest eliminating the detailed description after the third sentence ending with "...Salt and Boron Discharges into the Lower San Joaquin River." If the detail is retained the dates should be corrected to "....must, by July 2018 in a Critical Year Type and July 2014 in all other Year Types,"

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**INFO SHEET, Page 1, II., second paragraph:** Suggest change wording to: “The source of selenium in the GDA is sediments eroded through natural processes from the coastal range foothills that is mobilized through irrigation. The GDA is the primary source of discharges of selenium to the Mud Slough and the San Joaquin River in the watershed area.”

**INFO SHEET, Page 4, first line of first paragraph:** Area should be 33,100 acres not 38,700 acres.

**INFO SHEET, Page 7, first full paragraph on ‘New features’ should read:** “New features in Phase III include in-valley drainage reuse at the San Joaquin River Water Quality Improvement Project, an active land management program to utilize subsurface drainage on salt-tolerant crops”; (that is—strike “treatment” before drainage reuse; strike “facility;” and combine the later phrase about active land management into this part of the sentence—it’s all one thing).

**INFO SHEET, Page 7, second full paragraph:** please replace “total maximum daily limit” with “total maximum daily load”.

**INFO SHEET, Page 9, Table 1:** The selenium values are reversed between Monthly Mean and Maximum. The Boron maximum in 16 Sept to 14 March should be 2.6 mg/L.

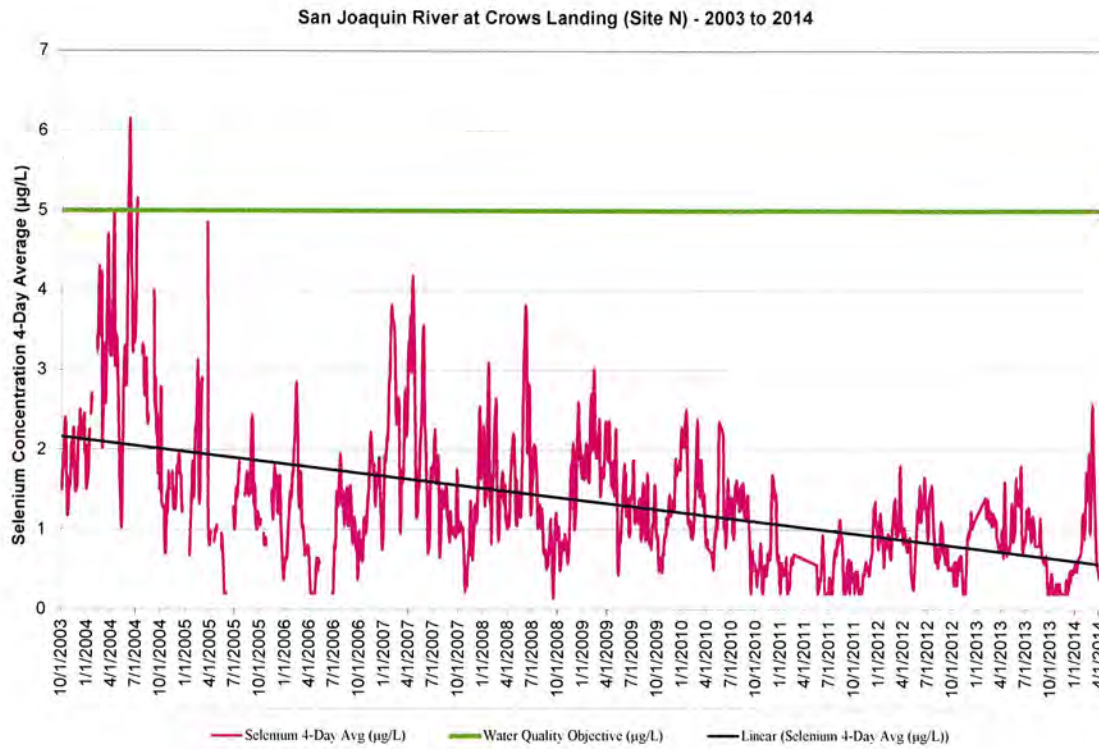
**INFO SHEET, Page 9, last paragraph:** The TMDL requirements were met in 2006 for wet and above year types and 2011 in dry-below normal and critical year types. The wording should be revised to so state.

**INFO SHEET, Page 8, A. Project Management, first sentence:** should read: the Authority represents its member local drainage and water districts that participate in the GBP.

**INFO SHEET, page 8. Last paragraph on Oversight Committee:** The Oversight Committee was established in the first Use Agreement signed in 1995. Therefore we suggest you delete the language “...was created in Phase II and...”

**INFO SHEET, Page 9, below Table 1:** This states the RTMP deadline as June 30. This should be corrected and changed to “...the Dischargers must by July 2018 in a Critical Year Type and July 2014 in all other Year Types: participate in...”

**INFO SHEET, Page 13:** We request that a figure be added (see below) showing the selenium concentrations at Site N – Crows Landing (which is the basin plan compliance point).



**INFO SHEET, Page 16, C. Fallowing of Land:** Replace are no longer irrigated with “supplied water” to “surface water”.

**INFO SHEET, Page 17, first line:** the Demonstration Treatment Facility is operated by the Bureau “with cooperation from” the Panoche Drainage District.

**INFO SHEET, Page 21, paragraph 6:** Suggest “biannually” be changed to “semi-annually”.

**INFO SHEET, Page 25, XI., first bullet:** Second sentence “re” should be “are”.

**INFO SHEET, Page 26, XI.:** Please add after the bullet on the Storm Event Plan, as follows:

“These measures are in addition to mitigation measures through the Use Agreement, including provision of water to enhance wildlife management areas and development of mitigation funds from monthly fees applicable to each pound of selenium discharged, commencing in 2016, as well as mitigation achieved through environmental commitments re operations, spill prevention, downstream users notification, regional archaeology, protection of China Island, Mud Slough, sediment and ongoing load reduction assurance measures.”

**INFO SHEET, Page 26, XII., last paragraph:** Please change to “A separate Board order *is being* developed . . .” instead of “will be developed.”

**INFO SHEET, Page 30, B.:** The end of the first sentence of the final paragraph of section B should be amended to read “....and eventually the water quality objectives in Mud Slough

(north) and the San Joaquin River above the Merced River.” Water quality objectives downstream are being met.

**INFO “SHEET, Page 30-31, C.:** The last sentence in the second paragraph of C. should be reworded to read “ in order to meet the water quality objectives in Mud Slough (north) and the San Joaquin River above the Merced River.” Water quality objectives downstream are being met.

**MRP, Page 7, II.D.1:** The fathead minnow feeding regime is incorrect. The narrative reads “A feeding regime of 2 hours prior to test initiation and 2 hours prior to test renewal shall be applied.” However, Section 11.10.5 of the method indicates that the fish are to be fed *Artemia* three times daily. Given that the MRP cites the method that is to be followed, we do not believe that it is necessary to have a description of feeding in the MRP. Our labs must simply follow the method requirements.

**MRP, Page 9, III.A.:** Should refer to semi-annual and previous semi-annual surface water monitoring results.

**MRP Page 12, C. Exceedance Reports:** This project is operated jointly by the USBR and the San Luis & Delta Mendota Water Authority. The attached table sets forth our understanding of the required exceedance reporting.

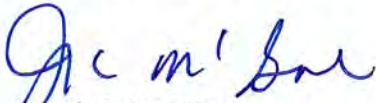
<b>Exceedance Reporting:</b>
(Due 5 business days from receipt of report from lab)
Sediment/Water Toxicity
Site B2/B3
Selenium load (use daily quality from auto sampler)
Pesticides (executive Officer to provide)
Molybdenum
Site D
All quality
Site R
Field, Se, B and Mo
Site N
Field, Se, B and Mo

**APPENDIX MRP-1, MANAGEMENT PLAN REQUIREMENTS FOR SURFACE WATER**

Some of the provisions included in APPENDIX MRP-1, MANAGEMENT PLAN REQUIREMENTS FOR SURFACE WATER are not well suited for an order covering surface water discharges from the Grassland Bypass Project. The Grasslands Bypass Project (GBP) area differs from other areas covered by the Irrigated lands Regulatory Program in two fundamental ways: (1) Surface water discharges from the GBP area are directly monitored rather than monitored by a representative monitoring program, and (2) the GBP area relies heavily on coordinated regional water quality improvement efforts (including efforts affecting individual grower management practices), rather than primarily and directly relying on individual grower management practices. Although portions of the administrative draft MRP-1 do recognize this distinction, other portions maintain inappropriate language that appears to have been crafted for the broader Irrigated Lands Regulatory Program. The San Luis & Delta-Mendota Water Authority would like to work with Regional Board staff following the Workshop to refine the language in proposed MRP-1 to better address discharges governed by this order.

Thank you for the opportunity to comment, and we look forward to working with the Board in finalizing and implementing this proposed Order.

Very truly yours,



Joseph C. McGahan  
Drainage Coordinator  
Grassland Basin Drainers