

200 W. Willmott Avenue
Los Banos, CA 93635-5501



(209) 826-5188
Fax (209) 826-4984
Email: veronica@gwdwater.org

BOARD OF DIRECTORS

Pepper Snyder
President

Doug Federighi
Vice President

Byron Hisey

Tom Mackey

Bob Nardi

Ricardo Ortega
General Manager

Veronica A. Woodruff
Treasurer/Controller

Ellen L. Wehr
General Counsel

April 14, 2017

VIA EMAIL

Jim Brownell
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670
Email: james.brownell@waterboards.ca.gov

Re: Amendment to Water Quality Control Plan to Adopt Salinity Water Quality Objectives for the Lower San Joaquin River

Dear Mr. Brownell,

Please accept these comments by Grassland Water District and Grassland Resource Conservation District ("GWD") regarding the Central Valley Regional Water Quality Control Board's proposed San Joaquin River Upstream of Vernalis Salt and Boron Basin Plan Amendment. The proposed objectives for salinity and boron in Reach 83 of the lower San Joaquin River are the result of significant efforts by Board staff to meet with the LSJR Committee and develop a program that will protect beneficial uses through achievable measures, while continuing to allow needed transport of salt from the lower San Joaquin River Basin.

GWD is a member of the LSJR Committee and wishes to express its support for the proposed Basin Plan amendments. GWD is located within the affected Basin and receives water deliveries from the U.S. Bureau of Reclamation for wetland habitat mitigation purposes. GWD manages and delivers water to state, federal, and private wildlife refuge habitat within the Grasslands Ecological Area, which is a significant public trust resource for the Central Valley and the State of California. As noted on page 8 of the Board's Staff Report, more than 90% of the San Joaquin Valley's historic wetlands have been lost through the effects of dam construction and land conversion. Managed wetlands within GWD comprise a significant portion of the San Joaquin Valley's remaining wetlands. GWD manages salinity in cooperation with neighboring agricultural and drainage districts, particularly those involved with the Grassland Bypass Project.

GWD also relies on the extensive Real Time Management Program that it has established within the wetland complex in partnership with the U.S. Bureau of Reclamation.

The proposed Basin Plan amendments appropriately rely on full implementation of the Grassland Bypass Project and continued monitoring and water management under the Real Time Management Program. GWD encourages the Board to play an active role in supporting these programs, which are subject to federal budget limitations and other uncertainties. Managed wetland owners including state and federal wildlife refuges within the Grasslands Ecological Area rely on the Grassland Bypass Project and the Real Time Management Program, not only to help achieve compliance with the proposed Basin Plan amendments but also to comply with the Board's Irrigated Lands Regulatory Program and existing water quality objectives for the San Joaquin River at Vernalis, and to protect the productivity of wetland resources.

The Grassland Bypass Project aims to eliminate agricultural return flows from the San Luis Drain by 2019, after which the Drain must continue to be maintained for the purpose of stormwater conveyance, with the Board's oversight, to protect wetland water quality. The Real Time Management Program is one of the best and only existing mechanisms for agricultural and refuge water users to coordinate together in meeting water quality objectives for the Basin. The Board's Staff Report notes in several places the importance of continuing the program:

“It should be emphasized that the continued implementation of components of the Real Time Management Program (RTMP) will also benefit salinity management in the river and assist with overall compliance. The RTMP facilitates the control and timing of wetland and/or agricultural drainage to the LSJR to coincide with periods when dilution flows are sufficient to meet salinity objectives.

...

Continued implementation of the San Joaquin Real Time Management Program (RTMP) will ensure that WQOs at Vernalis are met and develop the water quality information needed to both evaluate water quality at Crows Landing and Maze Blvd. and document salt management activities in the basin. The RTMP seeks to optimize/maximize the export of salt from groundwater, perched zones, and agricultural drain water from the LSJR Basin while ensuring that salinity objectives are met at Vernalis. The Central Valley Water Board has approved the RTMP in the Basin Plan as an alternative salt management strategy in lieu of monthly salt load allocations enforced by the Central Valley Water Board. The RTMP facilitates the control and timing of wetland, agricultural drainage, and/or other discharges to the LSJR to coincide with periods when the river has capacity to assimilate additional salts up to a WQO. The Eastern San Joaquin Watershed, the Western San Joaquin River and the Grassland Drainage Area Coalitions are members of the RTMP program.” (Board Staff Report, pp. 82, 110.)

In addition, GWD supports the proposed use of flexible standards during extended dry periods, and believes that compliance with the proposed Basin Plan amendments can be achieved

through planned drainage management activities, best management practices, and continued actions to comply with the downstream Vernalis objectives, which have been successfully met since 1995.

Thank you for considering these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ricardo Ortega". The signature is stylized with a large, sweeping initial "R" and a circular flourish at the end.

Ricardo Ortega
General Manager