



# United States Department of the Interior



## FISH AND WILDLIFE SERVICE

San Luis National Wildlife Refuge Complex  
Post Office Box 2176  
Los Banos, California 93635

23 December 2010

Mr. Jim Martin  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670

### *Via email and regular mail*

Dear Mr. Martin:

The majority of these comments pertain to the draft document, "Reclamation's Salinity Management Plan".

Regarding: *"Wetlands BMP Plan -- The (FWS), DFG, and the Grassland Resource Conservation District (GRCD) in coordination with Reclamation are developing BMP plans to reduce the impact of discharges from managed wetlands into the San Joaquin River."*

This statement presumes that drainage from wetlands is negatively impacting the San Joaquin River. I am unaware of any valid, peer-reviewed research – or even simple monitoring -- that has verified and quantified that hypothesis. In fact, decades of research have shown that wetlands generally improve water quality. In addition, *if* there is any negative impact, it needs to be quantified in relation to the level of impact from other drainers to assure the remedial actions are in proportion to the alleged impacts.

In addition, the concern of the Board regarding the water quality in the River should also be held for the water quality in the wetlands. It could be argued that the wetlands are more important for wildlife habitat than the River. Unfortunately, much of the water delivered to the wetlands of the Grasslands does not meet drainage standards – *before* it is even applied to the wetlands. Salinity levels have been reduced over the past ten years, but still often do not meet drainage standards.

Regarding: *"Plan Elements: • Wetlands Recirculation - This practice involves recycling water used on managed wetlands within the Grassland Ecological Area (GEA)."*

Common sense suggests that recirculating water – and reducing total flow -- within wetlands concentrates salts due to evaporation and evapotranspiration. This also conflicts with the Salinity Management Plan's statement: "The combination of land retirement, *refuge water supply*, and reduced salt loading from the Grasslands Bypass Project has altered the hydrology of the Basin and has improved the water quality of the San Joaquin River"; and the Compliance Monitoring and Evaluation Plan's statement: "The combination of voluntary land retirement, *increased level IV refuge water supply*, and reduced salt loading from the Grasslands Bypass Project has altered the hydrology of the Basin and has improved the water quality of the San Joaquin River over the past ten years" [emphasis added]. It is my

perspective that **additional** water to wetlands, flowing through to the River, will **improve** the water quality in the River.

Regarding: *“Mitigation Plan Effectiveness: Conceptually, a RTMP for the Lower San Joaquin River and the implementation of the Wetlands BMP plan could be very effective tools in removing high saline drainage out of the Basin without causing water quality violations, while minimizing reliance on New Melones to meet water quality standards.”*

If the RTMP and Wetlands BMP negatively affect the management of the wetlands, then reduced reliance on New Melones dilution flows – for the purpose of providing that “saved” water to irrigation contractors – will come at the expense of optimum wetland management. Thus, wetlands will be negatively impacted in order to provide more water for agricultural users. The Program to Meet Standards does not specify sacrificing wetland quality in order to reduce reliance on New Melones in order to meet obligations to water contractors.

Regarding: *“Wetlands Best Management Practices Plan -- Description: Managed wetlands compose a majority of the acreage within the Grassland Subarea”.*

This is not true – where are the acreage numbers? The acreage of the Grasslands Wildlife Area west of the San Joaquin River (or the Grassland Resource Conservation District) – **alone** (as a small subsection of the “Grassland Subarea”) -- is not all wetlands, and, in fact, is roughly 60% uplands. I would conjecture that the “Grassland Subarea” is approximately 5% wetland.

Sincerely,



Kim Forrest  
Wildlife Refuge Manager