



June 22, 2015

Pamela Creedon, Executive Officer  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive #200  
Rancho Cordova, CA. 95670-6114  
Email to: margaret.wong@waterboards.ca.gov

Subject: Comments on the May 2015 Tentative Waste Discharge Requirements for the Grassland Bypass Project

Dear Pamela:

Following are comments on behalf of the Grassland Basin Drainers on the Tentative Waste Discharge Requirements (WDRs).

The Tentative Grassland Bypass Project WDRs allow the Grassland Basin Drainers to continue to address discharges to surface water and to implement a very successful project that has resulted in dramatic water quality improvements. Many of these improvements are described in Attachment A of the WDR and are worth repeating here:

- There are significant reductions in selenium concentrations in Mud Slough (see Figure 9) including the meeting of 2019 water quality objectives in many periods;
- Selenium concentrations in the San Joaquin River below the Merced River have been well below the objectives since 2005 (see Figure 10); and
- Water quality objectives in Salt Slough are being met (Figure 11) and removal of discharges from the GBP from other wetland channels, other than during storm events, has resulted in significant water quality improvements. (see Figures 11 and 12).

The Grassland Basin Drainers look forward to working with the Regional Board to continue our track record of implementing successful projects that address incredibly challenging water quality issues.

We appreciate the opportunity to comment on these documents. Comments follow on the specific documents (page numbers refer to the non-strikeout versions):

WDR, Page 4, Table 2 and Attachment A Page 38, Table 6: The header should read "Discharge Limits". The reference to "December 2019" should be deleted. These

842 SIXTH STREET

SUITE 7

P.O. BOX 2157

LOS BANOS, CA

93635

209 826-9696

209 826-9698 FAX

discharge limits are the currently applicable limits in the Basin Plan adopted to meet the selenium objectives in the San Joaquin River below the Merced River. The selenium objectives in Mud Slough and the SJR above the Merced are not applicable until December 2019. The same wording would apply to paragraph II.A.2 page 12 of the GBP WDR.

WDR, Page 4, Finding 15: The sentence should be changed to: ‘Load limit reductions below TMML levels start in ~~2016~~2015.’ This is shown in Figure 5 of Attachment A.

WDR, Page 19, Figure 1: This map shows more than just the Grassland Bypass Project. Suggest it be titled “Map of the Grassland Drainage Area (comprising lands served by the Grassland Bypass Project) and Grassland Bypass Project monitoring locations.”

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).

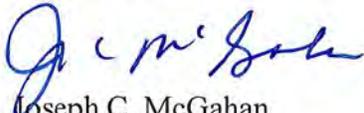
Att A, Page 20, paragraph V.C.: the following sentence should be edited to read “These lands are no longer irrigated, which ~~reduces~~ *eliminates* deep percolation *from irrigation* from these areas. *Every year additional lands may be temporarily fallowed.*” (Italics added).

Att A, Page 21, paragraph V.D.: third bullet, sentences should be changed to: “The SJRIP project also involves *an 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).*

Appendix MRP-1, Page 3, Man Plan Req’s, paragraph I.F.: refers to a June 1 Management Plan Progress Report. This should be April 30.

Very truly yours,



Joseph C. McGahan  
Drainage Coordinator  
Grassland Basin Drainers