

Wong, Margaret@Waterboards

From: Thomas Leeman <Thomas_Leeman@fws.gov>
Sent: Monday, June 22, 2015 12:22 PM
To: Wong, Margaret@Waterboards
Cc: Daniel Russell; joy_winckel@fws.gov
Subject: USFWS comments on the draft WDRs for the Grassland Bypass Project and the Growers of the Grassland Drainage Area

Dear Ms. Wong,

The USFWS, Sacramento Fish and Wildlife Office, will be submitting detailed comments on 2 draft WDRs: the WDR for the San Luis & Delta-Mendota Water Authority and U.S. Bureau of Reclamation for the surface water discharges from the Grassland Bypass Project (Bypass Project WDR) and the Draft Waste Discharge Requirements for the Growers in the Grassland Drainage Area (Drainage WDR). Below is a short summary of our concerns, with a detailed comment letter to follow.

For the Bypass Project WDR our concerns and recommendations are:

1. Selenium load limits specified in Table 2 of the draft WDR do not consider the binding water quality objective for selenium of 5 ug/L 4-day average for Mud Slough (north) and the San Joaquin River between Sack Dam and the Merced River by December 31, 2019 (Mud Slough Objective) that were part of the 2010 Basin Plan Amendment to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins (Basin Plan Amendment). The Mud Slough Objective would not be achievable with the load limits specified in Table 2. The Service recommends that the Regional Board revise the Bypass Project WDR to be consistent with the Mud Slough Objective in the 2010 Basin Plan Amendment.
2. The Bypass Project WDR proposes to reduce surface water quality monitoring in the south Grasslands wetland channels (Stations J, K, and L2 and M2) from weekly to only during stormwater events. The Service believes weekly water quality monitoring for selenium at Stations J, K, and L2 is warranted as exceedences of 2 ug/L are still occurring in those channels, those channels are listed on the State's 303(d) list as impaired for selenium, and could be resulting in harm to federally listed species. The Service recommends that the Regional Board require as part of the Bypass Project WDR Monitoring and Reporting Program, weekly water quality monitoring and reporting for stations J, K, and L2 for selenium.
3. Sediment disposal requirements in the WDR fail to include sediment disposal commitments from the 2009 Bypass Project EIS/R. The Service recommends that the Regional Board revise the Bypass Project WDR to include the environmental commitments specified in the Sediment Management Plan of the Bypass Project EIS/R.

For the Drainage WDR our concern and recommendation is:

1. The Drainage WDR applies to waste discharges from irrigated lands within the Grassland Drainage Area that could affect groundwater of the State. However, the Drainage WDR does not include selenium as a constituent to be monitored in the groundwater of the Grassland Drainage Area. Because of the close proximity of the area covered by the Drainage WDR to the public and private wetlands in the Grasslands Ecological Area, the potential is high that some of the discharges to groundwater in the Grassland Drainage Area could affect well water used for wetland water supplies. The Service, therefore recommends that the Regional Board include groundwater monitoring for selenium in the Drainage WDR.

Thank you for your consideration of our comments. A hardcopy of our detailed comments will follow.

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