

# SAN JOAQUIN VALLEY DRAINAGE AUTHORITY

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January 20, 2004

Leslie Grober  
Regional Water Quality Control Board  
11020 Sun Center Drive #200  
Rancho Cordova, CA 95670-6114

Subject: Comments on Salt and Boron Draft Basin Plan  
Amendment and Technical TMDL

Dear Les:

I am submitting these written comments on behalf of the Westside San Joaquin River Water Quality Coalition (Westside Coalition), which has been formed under the San Joaquin Valley Drainage Authority, a joint powers agency. Members of the Westside Coalition are water and drainage local agencies (including wetlands and refuges) representing approximately 430,000 acres of land primarily on the west side of the San Joaquin River from approximately the Stanislaus River on the north to Tranquillity on the south. The Westside Coalition has submitted a Coalition Group Notice of Intention under Central Valley Regional Water Quality Control Board, Region 5, Resolution R-5-2003-0105

The areas within the Westside Coalition are designated as high priority in the proposed Basin Plan Amendment. The Westside Coalition was organized to provide leadership and coordination of regulations such as for salt and boron.

Comment #1. Need for coordination with other programs.

I would like to commend the effort to coordinate this regulation with others facing non-point dischargers. The selenium program, Ag Waiver, salt and boron, pesticide, dissolved oxygen and future programs need coordination to be successful. For example there is the danger that the salt and boron TMDL would encourage dischargers to hold all tailwater returns to the San Joaquin River with concentrations higher than 315 micromhos (Section 4.4.6, Discussion on Alternative 4a/4b) significantly reducing flows in the River. There is a need for Regional Board coordination of all the regulatory programs affecting specific areas like the Westside Coalition.

Comment #2. Need for salt balance.

I appreciate the fact that the staff report recognizes the necessity of a salt balance in the non-point source lands (Section 4.4.1, Discussion on Real-time Load Allocations). This is vital to maintain irrigated agriculture in the over 1 million acres subject to this regulation.

Comment #3. Control of groundwater accretions.

The staff report notes that at times groundwater accretion to the San Joaquin River may exceed objectives (Section 4.4.3). This points to the difficulty of final implementation and compliance.

Comment #4. Support for Real time option.

Clearly the only way the salt and boron regulation has a chance to succeed is through the real-time operation option designated as alternates 4a and 4b (Section 4.4.6). This is also identified as the least cost option although I am apprehensive about the difference between the cost of this option compared with others. It is listed as 70% to 80% less than other options.

Comment #5. Postage Stamp Allocations.

The proposed load allocations are on a postage stamp basis (Table IV-7). Our watershed coalition will facilitate trading and management of discharges within our watershed. We have experience from the selenium trading program.

Comment #6. Problem with monthly allocations.

The minimal discharge allowance in certain peak summer months (Table IV-7), notwithstanding the relaxations is very restrictive and will need time and money to implement.

Comment #7. Implementation period too short.

The time for implementation (Table IV-6) is not consistent with other regulatory non-point processes. For example the selenium control program has a timetable of 15 years from adoption of the Basin Plan to complete compliance. The timetable in Table IV-6 for "high" priority areas is 8 to 12 years. Yet for Low priority areas the timetable is longer. It seems this is reversed from what should be the case, that is areas that will have the most difficult time meeting the load limits should have the longest time to implement. It appears that one component which has not been included is the time to educate the regulated community. I would recommend an implementation period for "High" priority areas be 15 years for Wet through Dry Year Types and 20 years for Critical Year Types.

I appreciate the opportunity to comment and can be contacted directly at 559-582-9237.

Very truly yours,

Joseph C. McGahan  
Watershed Coordinator for the Westside Watershed Coalition