

July 17, 2009

Via Hand Delivery and Electronic Mail

Gail Cismowski, Environmental Scientist
Central Valley Regional Water Quality Control Board
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Rancho Cordova, CA 95670-6114

SUBJECT: CV-SALTS Technical Advisory Committee Responses to the Central Valley Regional Water Quality Control Board Grasslands Bypass Amendment Questions

Dear Ms. Cismowski:

The CV-SALTS Technical Advisory Committee (TAC) agreed at the June 17, 2009 meeting to provide you with technical comments to the revised questions you presented at the April, 2009 TAC. We appreciate the opportunity to work with you in developing a process for future project review by the CV-SALTS TAC that will provide substantive, timely technical information, and understanding of where those projects interact with the development of a Central Valley Salinity and Nitrate Management Plan.

REVISED QUESTIONS FOR THE TECHNICAL COMMITTEE

Since the Grasslands Bypass Project time extension (Basin Plan Amendment), if approved as proposed, will result in a continued discharge of saline drainage to the San Joaquin River for up to an additional 9 years 3 months, staff needs some idea of how the stakeholders see this effort fitting into the developing regional salt and nitrate management plan. The questions have been modified in accordance with feedback received at the April TAC meeting and by email.

You presented the following revised questions and following each question are the TAC's responses:

1) Does the Committee have recommendations or comments for the Board regarding the drainage management approach that forms the basis of the Region's selenium control program as it relates to future salt management?

The selenium management issue needs to remain the Board's top priority in managing this drainage water. The question regarding salinity is more difficult to answer since CV-SALTS and the Board does not have a salinity management plan at present and will not have for a few years. The important thing for staff and the Board to keep in mind in putting together a Basin Plan Amendment for managing the drainage water over the next 9+ years is to be flexible as to the timing of drainage water discharges. This will allow the CV-SALTS Program to develop and recommend timing of discharges to maximize the export of salt from the basin as well as protect beneficial uses. Minimizing selenium in the discharge can only make the salt management portion of the program that much easier.

2) Does the Committee have recommendations or comments for the Board regarding the proposed [Grasslands] Basin Plan Amendment?

No additional comments other than those outlined in the answer above.

3) What role does the Committee see the Westside Regional Drainage Plan playing in the comprehensive regional salt and nitrate management plan? Does the Committee have recommendations for improvements or modifications to the drainage management strategy outlined in the WRDP that would make this local plan more consistent with the developing regional salt and nitrate management plan?

The Westside Regional Drainage Plan is centered on concentrating the selenium laden drainage water and isolating it from the river system (storing it in the basin). Although the Board does not have a policy regarding storage of salt in the San Joaquin River Basin, it does have one in the Tulare Lake Basin (TLB). In the TLB storage of salt is considered to be an interim solution until a more permanent disposal mechanism can be found because the storage of salt continues to have environmental consequences that cannot be mitigated, especially where selenium is involved. The staff in their recommendation for a BPA need to recognize that salinity management will only be as effective as our ability to remove salt from the basin.

Conclusion

In conclusion we hope you find these comments and recommendations useful in developing the Grassland Bypass Amendment, and look forward to continuing to coordinate closely through the development of that effort and the development of a Central Valley Salinity and Nitrate Management Plan.

Sincerely,

Nigel Quinn
Chair, Technical Advisory Committee
CV-SALTS

Mona Shulman
Chair, Executive Committee
CV-SALTS