CV-SALTS - Lower San Joaquin River Committee
Development of a BPA for Salt and Boron in LSJR
Alternative Approaches to Implementation of Proposed Water Quality Objective

At its meeting of March 26, 2015, the Lower San Joaquin River Committee (LSJRC) selected the following as its Preferred Water Quality Objective for the Lower San Joaquin River (LSJR) Reach 83:

Table 1: Tiered EC Objectives for Seasonal and Water Year Considerations for LSJR (µmhos/cm).

Season	Water Year Type				
	Wet	Above Normal	Below Normal	Dry	Critical
Warm Season					
March – Oct	1,350	1,350	--	--	--
March – June	--	--	1,350	1,350	1,550
July – Oct	--	--	1,550	1,550	1,550
Cold Season*					
Oct – Feb	1,550	1,550	1,550	1,550	1,550

a. During the cold season, an EC water quality objective exceeding 1,550 µmhos/cm may be allowed under a Regional Board-approved river management plan/agreement which improves salt management in Reach 83.

b. During periods of prolonged drought (defined as two or more sequential critical or dry water years) and in the year immediately following such a period, the following EC objectives shall apply in Reach 83 in lieu of the EC objectives described above: Annual average EC shall not exceed 1,600 µmhos/cm and short-term maximum EC shall not exceed 2,200 µmhos/cm. These objectives are required to protect the incidental MUN use in Reach 83.

In crafting the Basin Plan amendment for adoption of this water quality objective in Reach 83, four alternative implementation approaches emerge, as described below:

1. Adopt the Preferred alternative as numeric water quality objectives, to take effect immediately.
2. Adopt the Preferred alternative as numeric water quality objectives, to take effect on a date certain in the future when the Grasslands Bypass Project has been fully implemented (e.g. 2019).
3. Adopt the Preferred Alternative as in No. 2, with 1550 EC implemented as a numeric objective and 1350 EC implemented as a goal, both effective at a future date (e.g. 2019). Further, 1350 EC would, by default, become a numeric water quality objective at a later date certain, unless information was developed and approved by the Regional Water Board in a BPA to demonstrate that 1350 EC would not be consistently achievable upon implementation of the Grasslands Bypass Project.
4. Adopt the Preferred Alternative as in No. 2, with 1550 EC implemented as a numeric objective and 1350 EC implemented as a goal, both effective at a future date (e.g. 2019). Further, provisions would be included in the BPA to allow 1350 EC to become a numeric water quality objective at a later date through a subsequent BPA. Such action would require information to

be developed and approved by the Regional Water Board to demonstrate that 1350 EC would be consistently achievable in the long term.

In the above, if 1350 EC was adopted as a goal, the Basin Plan would include language that would emphasize the intent to attain the goal and would specify actions to be taken in the event the goal was not achieved. Such actions could include:

- Reporting by responsible parties including evaluation of the reason(s) for the failure to attain the goal.
- Review by Regional Water Board
- Appropriate follow up actions

Key Considerations in evaluation/selection of a preferred implementation approach by the LSJRC include:

- The technical basis for 1350 EC during the March through October time frame
- The intent of the Committee with regards to 1350 EC – reliance on Planned Bundle model prediction?
- The pros and cons of adopting 1350 EC as a numeric water quality objective or as a goal
- Legal review/input by Regional Water Board counsel