

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 the March 26, 2015 meeting, the Lower San Joaquin River Committee (LSJRC) selected Table 1 as its Preferred Water Quality Objective for EC for the Lower San Joaquin River (LSJR) Reach 83. The footnotes have been developed in response to direction received at the March 26th and April 23rd meetings.

Table 1: Tiered EC Objectives for Seasonal and Water Year Considerations for LSJR – Reach 83 (µmhos/cm)^{a,c,d}

Season	Water Year Type				
	Wet	Above Normal	Below Normal	Dry	Critical
Irrigation Season					
March – Oct	1,350	1,350	--	--	--
March – June	--	--	1,350	1,350	1,550
July – Oct	--	--	1,550	1,550	1,550
Non-irrigation Season^b					
Nov – Feb	1,550	1,550	1,550	1,550	1,550

- a. The EC objectives are a 30-day running average.
- b. During the non-irrigation 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 the LSJR basin, provides reasonable protection of actual beneficial uses in Reach 83 during that period, and does not result in requirements for increased water quality releases from New Melones reservoir to meet the Vernalis EC objectives.
- c. During extended dry periods (defined in footnote d), the following narrative EC objective shall apply in Reach 83 in lieu of the numeric EC objectives described in Table 1: EC concentrations shall not exceed levels necessary to provide reasonable protection of the actual AGR and MUN beneficial uses in Reach 83 during that period, and does not result in requirements for increased water quality releases from New Melones reservoir to meet the Vernalis EC objectives.
- d. The SWRCB’s San Joaquin Valley Water Year Hydrologic 60-20-20 Classification shall be assigned the following indicator values: Wet – 5, Above Normal – 4, Below Normal – 3, Dry – 2, Critical – 1. These indicators will be used to determine an extended dry period as follows:
 - An extended dry period shall be when the sum of the current year’s 60-20-20 indicator and the previous two year’s 60-20-20 indicators is four (4) or less.

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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 $\mu\text{mhos/cm}$ EC implemented as a numeric objective and 1350 $\mu\text{mhos/cm}$ EC implemented as a goal, both effective at a future date (e.g. 2019). Further, 1350 $\mu\text{mhos/cm}$ 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 $\mu\text{mhos/cm}$ EC would not be consistently achievable upon implementation of the Grasslands Bypass Project.
4. Adopt the Preferred Alternative as in No. 2, with 1550 $\mu\text{mhos/cm}$ EC implemented as a numeric objective and 1350 $\mu\text{mhos/cm}$ EC implemented as a goal, both effective at a future date (e.g. 2019). Further, provisions would be included in the BPA to allow the 1350 $\mu\text{mhos/cm}$ EC goal 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 $\mu\text{mhos/cm}$ EC would be consistently achievable in the long term.

In the above, if 1350 $\mu\text{mhos/cm}$ 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 $\mu\text{mhos/cm}$ EC during the March through October time frame
- The intent of the Committee with regards to 1350 $\mu\text{mhos/cm}$ EC – reliance on Planned Bundle model prediction?
- The pros and cons of adopting 1350 $\mu\text{mhos/cm}$ EC as a numeric water quality objective or as a goal
- Legal review/input by Regional Water Board counsel