

Performance Goal as measured at Crows Landing through implementation of currently planned salinity management actions such as, completion of the final phase of the Grassland Bypass Project. If the planned salinity management actions do not result in the attainment of the EC Performance Goal as expected, Regional Water Board staff will evaluate why the EC Performance Goal was not achieved. Such evaluation may include requesting reports from dischargers in Reach 83, soliciting input from interested parties, or other appropriate actions such as, requesting information from the Real-Time Management Group formed under the 2006 Salt and Boron TMDL for the San Joaquin River.

- ~~Full Implementation of the Real Time Management (RTM) Program – RTM facilitates the control and timing of wetland and/or agricultural drainage to the LSJR to coincide with periods when dilution flows are sufficient to meet salinity objectives. It is anticipated that the RTM Program will be fully implemented by 2020.~~

- Full Implementation of the Grassland Bypass Project - It is projected, based on the modeling results for the Planned Alternative (Section 4.1.1), that the Preferred Alternative EC WQO can be consistently achieved after implementation of the Grassland Bypass project. The Grassland Bypass project is currently scheduled to be completed by the end of 2019. As such, the effective date of the Preferred Alternative EC WQO should be established to occur at an appropriate time after the completion of the Grassland Bypass Project.

Upon adoption of the proposed EC WQO, changes to NPDES permits and monitoring programs may be necessary to implement the new WQO. Appendix D and the Task 6 long-term monitoring program memorandum will provide guidance regarding these changes.

- Wastewater Treatment Plant Effluent Limits – Appendix D has been prepared to provide guidance to NPDES permit writers regarding the derivation of effluent limits for EC in the permits for the Cities of Modesto and Turlock. As described in the appendix, new effluent limits may not mirror the new WQOs in terms of points of compliance for the averaging period or end of pipe EC concentration. Mass loading analysis, WARMF modeling, and antidegradation considerations should be used, as appropriate, in the derivation of EC effluent limits in these NPDES permits.
- Water Quality Monitoring - Routine EC and boron monitoring should be conducted in the LSJR at Crows Landing and EC monitoring at Maze Road in order to assess compliance with the proposed EC and the existing boron WQOs for Reach 83, and to determine the effectiveness of the implementation program<sup>14</sup>.

**Comment [JB1]:** This is not key to implementation of the proposed EC WQOs. The modeling performed to simulate the preferred alternative, did not include the existing RTMP. Therefore, RTMP should be removed from the Implementation Plan recommended here.

<sup>14</sup> Pursuant to Task 6 a long-term monitoring and reporting program will be developed. The monitoring program will determine compliance with the WQOs as well as the effectiveness of the implementation program. Ongoing monitoring efforts that could be included in the program will also be identified.