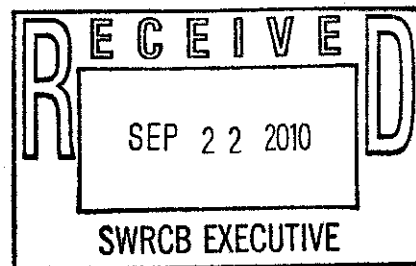




September 21, 2010

Jeanne Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Sent via email to commentletters@waterboards.ca.gov



Subject: Recommended Approval of the San Joaquin River Selenium Control Plan Basin Plan Amendment

On behalf of the California Waterfowl Association (CWA), I appreciate the opportunity to provide comments on the proposed approval of the amendment to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins that would revise the selenium control plan for the San Joaquin River. CWA is a charitable 501 (c)(3) organization dedicated to conserving California's waterfowl, wetlands, and outdoor heritage. We represent the interests of over 21,000 members statewide, and we are a founding partner of the Central Valley Joint Venture.

The Grasslands Ecological Area (GEA) is the largest contiguous wetland area remaining in the United States. The GEA consists of over 180,000 acres of wetlands in federal, state, and private ownership. Nearly 110,000 acres of these precious, historic wetlands are privately-owned. The remaining acres are managed by the U.S. Fish and Wildlife Service and the California Department of Fish and Game. This unique area has maintained incredible diversity, offering permanent and seasonal wetlands, riparian corridors and native grasslands. More than 550 species of birds, animals and plants have been identified in the Grassland Wetlands. The Grassland Wetlands winter in excess of 1 million waterfowl and is also an important wintering and staging area for shorebirds. Peak shorebird numbers in excess of 200,000 have been observed in the Grasslands, and it has been recognized as an Internationally Significant Shorebird Site by the Western Hemisphere Shorebird Reserve Network. It has also been designated a Globally Important Bird Area by the American Bird Conservancy and the National Audubon Society, and has garnered distinction as a Wetland of International Importance under the RAMSAR Convention (one of only 22 in the world). In addition, the GEA supports thirteen threatened and endangered species plant and animal species.

The value and productivity of these wetlands are dependent on continuing to reduce soil salt accumulations, and maintaining the use of the San Luis Drain (as proposed) is the only currently viable alternative to accomplish this. As such, California Waterfowl recommends an extension of the of the Grasslands Bypass Project (GBP) and continued use of the San Luis Drain for the full 10 years as proposed to prevent salt and selenium

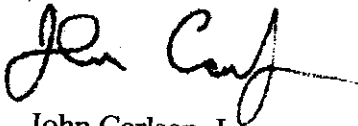
enriched surface and sub-surface flows from entering critical wetlands of the GEA. The significant reduction of salt and selenium load from the Grassland Drainage Area (GDA) and the observed improvements to wetland habitat over the past 15 years can be directly attributed to the success of the GBP and the use of the San Luis Drain.

The GBP and the San Luis Drain prevent discharge of surface and subsurface agricultural drainage water, with elevated salt and selenium concentrations, from entering into state and federal wildlife refuges and wetlands in the GEA. With the exception of certain stormwater events, all discharges of drainage water from the GDA into wetlands and refuges have been eliminated since the implementation of the GBP. All stormwater events will likely result in discharges to Grasslands Wetlands without the continued use of the San Luis Drain. The inability for Grassland-area farmers to utilize the San Luis Drain to bypass the wetland complex would result in higher water tables and higher concentrations of salt and selenium in the shallow ground water, which will degrade wetland water supplies.

Over the past 15 years of the GBP, there has been significant improvement in habitat and water quality of Grassland Wetlands and the San Joaquin River. The continued use of the San Luis Drain is an essential tool to preserve the integrity of California's largest contiguous wetland complex.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "John Carlson, Jr.", written in a cursive style.

John Carlson, Jr.
President