



April 27, 2010

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Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Dr., #200
Rancho Cordova, CA 95670

Subject: Comments on the Amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins to Address Selenium Control in the San Joaquin River Basin

I would like to commend you for a well written and detailed Staff Report on the Basin Plan Amendment. I think it is a complicated issue and your write-up shows understanding and helps others understand the situation. Specific comments follow.

On table IV-4 it seems it would be useful to leave in the current objectives to better explain that these water qualities objectives are currently being met.

842 SIXTH STREET

Page 2, 1.2, The Grasslands – the paragraph describing ownership of the San Joaquin River Water Quality Improvement Project needs to be updated in the final sentence. It would correctly read, “The 6,200-acre In-Valley drainage reuse area, called the San Joaquin River Improvement Project, is owned by Panoche Drainage District (as to 4,200 acres) and 2,000 acres by Panoche Drainage District and Firebaugh Canal Water District. Panoche Drainage District operates the reuse area in coordination with Firebaugh Canal Water District.”

SUITE 7

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Page 5, paragraph 1.3.1 – the correct citation should be Panoche Drainage District instead of Panoche Water District and Camp 13 Drainage District instead of Camp 13 Water District.

LOS BANOS, CA

Page 6, middle paragraph – it might be useful to note that the negotiated loads after 2014 are less than the basin plan adopted TMDL selenium loads.

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Page 9, Figure 4 – the title says yearly averages but I believe probably the numbers are monthly averages. Same with Figure 5.

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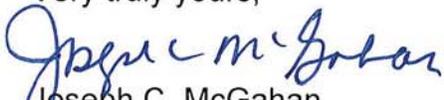
Page 12, first paragraph – The numbers should be edited. Our December 29, 2009 annual report indicates that 11,109 acre feet were used on the SJRIP reuse area with a discharge out of the San Luis Drain of 13,166 acre feet. Therefore the sentence should read “In 2009 the drainage area generated approximately 24,000 acre feet of drainage after source control and recycling with the reuse area capable of managing approximately 11,000 acre feet.”

Page 16, middle paragraph – in addition to Panoche Silver Creek flood flows, local flood flows that fall on the saturated soils within the Grassland Drainage Area follow the natural slope downstream and can cause ponding and break into canals and/or wetland channels.

Page 16-17: The recommended Alternative 2 establishes a performance goal by December 31, 2015 in Mud slough (north) and the San Joaquin River from Sack Dam to the Merced River. Alternative 2 also indicates that the GAF must either have a treatment system fully in place by 2015 or if treatment is not fully identified by 2012, identify an alternative in the January 1 2013 update report. The same requirements appear in the Reporting section on page 17. The Use Agreement, page 12, Item III.G.1., requires “By the end of Year Four (2013), a Report to the Oversight Committee provided at a noticed meeting regarding the Draining Parties’ plan to meet loads in Years Six through ten (2015-2019).” We request that the identification of alternate and/or supplemental drainage management strategies that will be investigated and employed be delayed until the January 2014 Long-Term Drainage Management Plan Update which would allow the same information to be provided on the same schedule as required in the Use Agreement.

Page 22, Mitigation Measures, 2nd paragraph: The statement beginning after the semicolon that adoption or not adopting the Basin Plan Amendment will not affect mitigation activities is not correct. If the Basin Plan Amendment is not adopted, the Use Agreement will terminate and those environmental mitigation actions that have been negotiated, as well as those under Biological Opinions, will no longer have any effect.

Very truly yours,



Joseph C. McGahan
Drainage Coordinator
Grassland Basin Drainers