Public Comment
SJR Selenium Control BPA
Deadline: 9/22/10 by 12 noon

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September 16, 2010

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

Subject: Comment Letter-San Joaquin River Selenium Control Basin Plan Amendment

Dear Ms. Townsend:

The Grassland Water District (GWD) appreciates the opportunity to submit 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.

The 180,000 acre Grassland Ecological Area (GEA), which includes the GWD and Grassland Resource Conservation District (GRCD), constitutes the largest contiguous wetland left in California. The GEA supports in excess of one million wintering waterfowl, and is also an important fall and spring migration stopover site for shorebirds, with peak numbers in excess of 200,000 shorebirds observed annually. In 1991, the Western Hemisphere Shorebird Reserve Network recognized the GEA as an Internationally Significant Shorebird Site. It has also been designated a Globally Important Bird Area by the American Bird Conservancy and the National Audubon Society. In 2005, the GEA was designated as Wetlands of International Importance under The Convention on Wetlands of International Importance, making it one of 22 Ramsar sites in the United States. Additionally, the GEA is known to support thirteen threatened and endangered plant and animal species including the giant garter snake, California tiger salamander, Fresno kangaroo rat, Swainson's hawk, and the San Joaquin kit fox.

The extension of the Grassland Bypass Project (GBP) and continued use of the San Luis Drain for the full 10 years as proposed is imperative to the prevention of salt and selenium enriched surface and sub-surface flows from entering GWD conveyance system and the vital wetland

habitats of the GRCD. The significant reduction of salt and selenium load from the Grassland Drainage Area (GDA) to the GRCD 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.

Our comments related to the discontinuation of the use of the San Luis Drain focus on the following:

- 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 GRCD.
- The San Luis Drain is the sole outlet for not only subsurface agricultural drainage, but also stormwater runoff from GDA. With the inability to utilize the San Luis Drain, stormwater will compound against the CCID Main Canal and have to be evacuated through the Camp 13 and Agatha Canals and moved through the wetland complex.
- Since implementation of the GBP, all discharges of drainage water from the GDA into wetlands and refuges have been eliminated, outside of stormwater events that exceed the capacity of the San Luis Drain. The continuation of the use of the San Luis Drain is necessary to prevent surface and sub-surface flows from Upper Grassland Basin discharges from entering the Grassland Wetlands during **all** winter storm events.
- The inability for the 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 through shallow groundwater infiltration into wetland conveyance.

Prior to the GBP, the GWD and GRCD received subsurface agricultural drainage and stormwater runoff from the GDA through the Camp 13 and Agatha Canals. Today, the San Luis Drain is the main outlet of the GDA preventing salt and selenium enriched subsurface agricultural drainage and stormwater from entering critical wetland habitats of the GRCD. The San Luis Drain has a maximum flow capacity of 150 cfs, which can contain selenium concentrations up to 60 ppb. Since the implementation of the GBP there have been three storm events where the San Luis Drain maximum capacity was reached resulting in the diversion of excess flow into the GWD conveyance via the Camp 13 and Agatha Canals. If the use of the San Luis Drain were terminated, **all** storm event floodwaters from the GDA would inevitably enter the GWD introducing significant selenium and salt load into the GRCD. The continued use of the San Luis Drain is vital to the prevention of selenium and salt loading into GRCD wetland habitat.

If the San Luis Drain is not available for conveyance of drainage water, the problems associated with the contamination of wetland water supplies during storm events will be further compounded as the Grassland Area Farmers move towards zero discharge. Without this outlet, selenium and salt enriched drainage water will percolate into the shallow ground water,

ultimately entering the wetland complex through ground water accretion and contribute to the degradation of wetland water supplies.

Over the past 15 years of the GBP, there have been significant strides in habitat and water quality improvement of the 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.

The Grassland Water District appreciates the opportunity to comment. Please do not hesitate to contact me should you have any questions.

Sincerely,

David L. Widell
General Manager