

AttachmentEcological Services  
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FWS/EC97-015

November 12, 1996

Mr. Jerrold A. Bruns  
Central Valley Regional Water Quality Control Board  
3443 Routier Road, Suite A  
Sacramento, California 95827

Subject: Modification to the Regional Board's existing Policy for  
Obtaining Salt Balance in the San Joaquin Valley contained within the  
Water Quality Control Plan (Basin Plan) for the Sacramento and San  
Joaquin River Basins

Dear Mr. Bruns:

The U.S. Fish and Wildlife Service (Service) offers the following as comments on the Central Valley Regional Water Quality Control Board's (Regional Board) continuing effort to improve the Sacramento and San Joaquin River Basin Plan. These comments are specific to your recently proposed amendment addressing a *Policy for Obtaining a Salt Load Balance in the San Joaquin Valley*.

The proposed change in the Regional Board's policy presents three issues the Service would like to address. The first issue is the inclusion of wetland management as a source of wastewater to the San Joaquin River comparable to agricultural drainwater and municipal and industrial wastewater. The second is the data (pie charts) that suggest that the wetlands are a significant or primary source of salt in the San Joaquin Valley (Valley). The third issue concerns the promotion of a Valley Wide Drain as the best technical and only feasible solution to salt balance in the Valley because it is a logical extension of existing policy.

Wetlands management as a source of wastewater.

Within the context of the proposed policy text and the supportive text of the staff report, the Regional Board proposes to define wetland management flows as wastewater and alludes to the possibility of regulating these flows for salt balance purposes. The Service disagrees with defining wetland management flows as wastewater and including these flows in the proposed policy as a discharge comparable to agricultural drainwater and municipal and industrial wastewater.

As recognized by the staff report on page 3, salt loading prior to human activity was a result of natural processes. There were once 1.1 million acres of wetlands in the San Joaquin Valley and only about 10 percent of them remain. The San Joaquin Valley ecosystem has suffered decades of abuse from water diversions, the conversion of wetlands to urban and agricultural uses, the unnatural irrigation of semi-arid land and installation of tile drainage, and heavy pesticide use. The few remaining wetlands in the valley are a

natural function of the ecosystem and are managed, under the constraints of limited water quantity and less than ideal quality, as near to the natural flooding cycles as possible in the severely altered hydrology and effluent dominated waters of the San Joaquin Basin. Any salt loading associated with wetland management is therefore a result of natural processes and should not be carelessly included in such a policy statement.

Wetlands do not contribute significantly to the salt load, should not be classified as wastewater, are not unfit for reuse, and their discharge should not be confined to an artificial drain. Wetland management flows currently provide a benefit to the ecosystem and now that full and cleaner water allotments are available, the benefits to the ecosystem and agricultural drainage management will increase. Obviously wetland management flows are intimately tied to the drainage issue and will be involved in the solution, but to define these flows as wastewater and include them collectively with other discharges in the valley as part of the problem is as misleading as suggesting that trees pollute the air.

The Management Plan for Agricultural Subsurface Drainage and Related Problems on the Westside San Joaquin Valley (Rainbow Report) was prepared with tens of millions of dollars and 5 years of studying the drainage problems of the San Joaquin Valley. The Rainbow Report does not identify wetland management flows as part of the problem. The major reason for the salt imbalance in the San Joaquin Valley is manmade inputs from agricultural activities, extensive water diversions, import of salt via water delivery systems, and other changes to the natural hydrology. There is no text or data in the Regional Board's staff report that can justify the addition of wetland management to the policy statement as proposed. The staff report makes a correct assumption that reducing acreage of the remaining wetlands in the Valley to reduce salt loads is misguided management as well as unlawful. The Service strongly recommends that reference to wetland management be removed from the proposed policy and all other areas of the Basin Plan that implicate it as part of the problem.

#### Salt loading data.

The data summarized on page 2 of the staff report is presented without references, number of samples, location and number of sample sites, or sampling period thus making the information less than ideal for determining the appropriateness of such a policy change. Without references we have no way of knowing who collected the data, how the data was collected, and whether the data is from multiple sources and is compatible. The location and number of sample sites is critical in assessing the source of salt loads in the maze of multi-use channels in the San Joaquin Valley. Timing is also critical in this assessment. Were measurements made in the summer, fall, winter, or spring? Is the data from last year or the last 10 years? Since the Grasslands Bypass has only been open 2 months, any database that is used to estimate wetland contribution to the salt load is based on a time when many wetlands were receiving water of poor quality. The data presented by the Regional Board is insufficient to justify the proposed policy change.

It is imperative for the Board to provide for our review the technical information or data that the Regional Board used to determine that wetlands contribute 47,000 tons of salt to the San Joaquin River. Even using the

information presented, wetlands produce only 4.8 percent of the total salt load and 16.7 percent of the uncontrollable salt load. Since these presumed loads are a natural occurrence as discussed above, the Service does not consider wetlands to be a significant or primary source of salt in the San Joaquin River.

#### The Valley Wide Drain.

The Service recognizes the recent efforts of the Regional Board to implement in-valley solutions for drainage problems (i.e., Grasslands amendment), however, to fully address the complex issues of salt balance and agricultural drainage, the Regional Board must give equal weight to in-valley solutions under its policies as it does to a valley-wide drain. The Rainbow Report recognized the ultimate need of a master drain or valley-wide drain, but recommends that in-valley solutions must be part of the near-term and long-term solution. The development of piecemeal policies adds to the problem and does not improve the Basin Plan nor does it lead to a coordinated effort by all parties involved. Stressing a valley-wide drain policy without giving equal consideration to in-valley solutions lessens discharge incentives to implement those in-valley solutions. This allows continued degradation of the resources, an increased number of conflicts, and extends the time line for implementing truly productive solutions.

The Regional Board has apparently made the preliminary determination that the best long-term technical solution is the valley-wide drain. It is premature for the Regional Board to make such a decision when there is no specific project plan, scope of work, identified discharge point, location of any additional drainage connections, wetland impacts identified, endangered species impacts identified, cost benefit ratio assessment, and no environmental impact report. At this time it may be only feasible to indicate that the valley-wide drain is one technical solution that should be evaluated. Without a real plan, proper information, good data, evaluation of other solutions, and implementation of in-valley solutions we cannot conclude that the valley-wide drain is the only feasible long range solution. Therefore, the Service does not support the proposed policy change as it is written.

We are available to assist the Regional Board in drafting a policy that truly addresses the long-term solutions to achieving a salt balance in the San Joaquin Valley. If you would like to discuss these issues further please contact Dr. Steve Schwarzbach or Mr. Tom Maurer of my staff at 916-979-2110.

Sincerely,

ORIGINAL SIGNED

Joel A. Medlin  
Field Supervisor

cc: ARD-ES, Portland, OR  
Manager, San Luis NWR

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