

### CA Save Our Streams Council



December 16, 2021

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**Re: Insufficient CEQA & NEPA Compliance for the Mud Slough Streambed Alteration Permit Request and 401 CWA Certification Request \_San Luis Delta Mendota Water Authority Water [SLDMWA]**

Dear Ms. Gangl:

The State Water Resources Control Board, a responsible agency, cannot rely upon the CEQA documents prepared by the lead agency the San Luis Delta Mendota Water Authority (SLDMWA) for the proposed Mud Slough dredging and discharges under Section 401 of the Clean Water Act (CWA) and the Porter-Cologne Water Quality Control Act (Porter-Cologne).

A subsequent EIR must be prepared pursuant to CCR Section 15162.<sup>1</sup> The project also will discharge dredge and fill material into the waters of the United States, thus compliance with CWA, the Rivers and Harbors Act of 1899 along with NEPA are required. The MND fails to analyze and disclose the direct impacts of introducing selenium laden water above 2 ppb into the State of California China Island refuge and the private wetlands operating under a federal wetland easement at Newman Lake.<sup>2</sup> Further, both the direct impacts and cumulative impacts to fish and waterfowl from altering the stream bed, stream flows, discharge of dredged or fill material along with the placement of the dredge materials have not been disclosed, analyzed, sufficiently considered or mitigated. Alternatives were not considered.

The San Luis & Delta Mendota Water Authority (SLDMWA) is seeking a Section 401 State Certification to protect wetlands relying upon the MND issued for the Mud Slough Restoration Project (SCH # 2021060585)<sup>3</sup>. This project in addition to dredge and fill activities, will route flows from Mud Slough (North) into the CDFW's North Grasslands Wildlife Area, China Island Unit (China Island) and private wetlands associated with the Newman Land Company including Newman Lake. The SLDMWA is permitted by the Central Valley Regional Water Quality Control Board via a Waste Discharge Requirement (WDR) for the Grassland Bypass Project (GBP) to allow stormwater flows commingled with groundwater contaminants including selenium to be routed from the San Luis Drain to Mud Slough (North).<sup>4</sup> Since 1995, operating without the required NPDES permit<sup>5</sup>, the GBP has conveyed water contaminated with pollutants, including selenium, through the San Luis Drain (Drain) to Mud Slough (North).

The GBP WDR allows selenium concentrations in Mud Slough (North) that are toxic to fish and wildlife and can cause migratory bird deformities and reproductive impairment. Impacts of routing Mud Slough flows to wetlands was not considered in the GBP WDR. Further, the 2015

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<sup>1</sup> <https://www.law.cornell.edu/regulations/california/14-CCR-Sec-15096>

<sup>2</sup> In 2016, EPA revised their national selenium criterion because of a draft jeopardy biological opinion from USFWS on the 5ppb standard in EPA's California Toxics Rule. EPA avoided a final jeopardy opinion by agreeing to revise the 5ppb criterion requiring objectives of 1.5/3.1 ppb criterion. Any value that China Island and/or Newman Lake might have for the ESA-listed species that USFWS called jeopardy on at 5 ppb (in the draft CA Toxics Rule biological opinion) would be compromised by water with 5 ppb or higher. Listed species of concern in the project vicinity include the giant garter snake, Swainson's Hawk, Aleutian Canada goose, Mountain plover and tricolored blackbird. And potential impacts to splittail and salmonids.

<sup>3</sup> See: <https://ceqanet.opr.ca.gov/2021060585>  
The Notice of Determination was filed December 9, 2021.

<sup>4</sup> See WDR Order No. R5-2019-0077:  
[https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2019-0077.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2019-0077.pdf)

<sup>5</sup> See Pacific Coast Federation of Fishermen's Associations v. Glaser, 937 F.3d 1191 (9<sup>th</sup> Cir. 2019) The SLD collects and commingles polluted water from a variety of sources, both ground and surface, and conveys this pollution into Mud Slough and hence to the San Joaquin River and the San Francisco, Sacramento-San Joaquin Delta Estuary. The SLD conveys and discharges contaminated water that contains high levels of selenium, boron, molybdenum, salt, pesticides and other pollutants. And <https://calsport.org/news/wp-content/uploads/Volker-2019-12-23-WWT-to-Emerson-re-SLDMWA-EA-Use-Agreement.pdf>

GBP WDR<sup>6</sup> noted in Item 30(g) that, “Control structures will be maintained to prevent inflow of drainage from Mud Slough (north) to the CDFW China Island Unit.” And the 2019 GBP WDR<sup>7</sup> refers to mitigation measures in other documents including “provision of water to enhance wildlife management areas” and “protection of China Island...” Yet the requested 401 Certification permit for the Mud Slough Restoration Project, if granted, would allow the introduction of stormwater commingled with groundwater contaminants to these State and private wetlands under federal easement protections. Such a certification if granted would violate the CWA.

The Board of the SLDMWA on Thursday December 8, 2021, approved a Mitigated Negative Declaration (MND) for the Mud Slough Restoration Project, which will result in the alteration of the Mud Slough streambed and flows. This MND is deficient. Among the deficiencies the MND does not analyze nor disclosed the impacts from the introduction of this contaminated water into these public and private wetlands. The undersigned have submitted comments on the MND.<sup>8</sup> Many of the undersigned also objected to the adoption of the MND.<sup>9</sup> Ignoring these objections, SLDMWA proceeded to adopt a MND in an attempt to satisfy SWRCB’s CEQA obligations when issuing a 401 Certification of this magnitude and impact. However, the SLDMWA Board of Directors failed to address serious environmental impacts and precluded informed decision making and therefore, have failed to comply with CEQA, NEPA and the CWA.

Further, we have confirmed that the Newman Land Company is under federal easement with the USFWS at San Luis National Wildlife Refuge.<sup>10</sup> Therefore, impacts associated with the project called the “Mud Slough Restoration Project” on Newman Lake should also be considered under a NEPA review. This has not been done.

The MND for the SLDMWA’s proposed discharge and fill as described in the Mud Slough Restoration Project fails to disclose or analyze:

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<sup>6</sup> See WDR Order No. R5-2015-0094:

[https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/fresno/r5-2015-0094.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/fresno/r5-2015-0094.pdf)

<sup>7</sup> See WDR Order No. R5-2019-0077:

[https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2019-0077.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2019-0077.pdf)

<sup>8</sup> [https://calsport.org/news/wp-content/uploads/PCL-et-al\\_Cmts-SLDMWA-MND-for-Mud-Slough-Restoration-Project\\_7-28-2021.pdf](https://calsport.org/news/wp-content/uploads/PCL-et-al_Cmts-SLDMWA-MND-for-Mud-Slough-Restoration-Project_7-28-2021.pdf)

<sup>9</sup> Letters of Objection for Mud Slough Restoration Project Objection to MND and NOD December 9, 2021, from Planning and Conservation League, Institute for Fisheries Resources, Environmental Water Caucus, Sierra Club California, Pacific Coast Federation of Fishermen’s Associations California Sportfishing Protection Alliance, Friends of the River, Southern California Watershed Alliance and North Coast Rivers Alliance to Federico Barajas.

<sup>10</sup> Pers. comm. Kim Forrest, Refuge Manager San Luis NWR, USFWS, 12.15.2021.

1. Water quality objectives that will protect the state, federal and private wetland areas impacted by the project.<sup>11</sup>
2. The quality of water provided to China Island and Newman Lake wetland areas prior to this project. This is important baseline information that should have been disclosed and used to analyze the impacts of the project in the MND. The GBP water provided to China Island and Newman Lake since 2010 has been from wells. The GBP 2009 Final EIS/R, Appendix D, page 17-18 noted that, “The results of chemical analysis of well water samples that probably represent the proposed supply water indicate that water quality is good although the salinity is elevated relative to San Joaquin River water quality objectives. Selenium is consistently less than the reporting limit of 2 ppb.”<sup>12</sup>
3. Impacts from changing the source of water for China Island and Newman Lake wetland areas from well water (consistently below 2 ppb selenium) to flows in Mud Slough. The 2019 GBP WDR lists the water quality objectives for selenium in Mud Slough (North) as 5 ppb 4-day average, and an acute maximum of 20 ppb.<sup>13</sup> These selenium objectives are not protective of fish and wildlife beneficial uses and have been documented to cause reproductive failure and deformities in fish and wildlife. These water quality objectives are not protective of aquatic life and pose a serious threat to endangered species.
4. No explanation is provided in MND why China Island and Newman Lake are not afforded the same protective water quality objectives as required in the Regional Board’s Basin Plan for the Salt Slough and the Grasslands wetland supply channels and listed in Appendix 40 (objective of 2 ppb selenium, monthly mean).<sup>14</sup> In 1996 the Central Valley Regional Water Board amended the Basin Plan to address selenium in the San Joaquin River, Salt Slough, Mud Slough, and wetland supply channels in the Grassland watershed. The amendment included several control actions, with the first priority being to “*Separate subsurface agricultural drainage containing high levels of selenium from sensitive wildlife areas.*”<sup>15</sup>

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<sup>11</sup> The May 2010 Final MOU between CDFG and the SLDMWA regarding the GBP included the following in Exhibit 4 of the MOU: “The Authority shall supply 100 ac-ft of water per month or 1,200 ac-ft per year to China Island WA... The water supply shall meet the Department’s water quality objectives and the source shall be surface water, well water, or a mixture of both surface and well water to meet the quantity and quality objectives.”

<sup>12</sup> See: [https://www.usbr.gov/mp/nepa/includes/documentShow.php?Doc\\_ID=4413](https://www.usbr.gov/mp/nepa/includes/documentShow.php?Doc_ID=4413)

<sup>13</sup> See Order R5-2019-0077, Attachment A, Table 5, page 37:  
[https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2019-0077.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2019-0077.pdf)

<sup>14</sup> See Table 3-1, page 3-3 of the Sacramento River Basin and San Joaquin River Basin Plan:  
[https://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/sacsjr\\_201805.pdf](https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf)  
And, See Appendix 40 to Basin Plan, pdf pgs 206-208:  
[https://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/sacsjr\\_appendices.pdf](https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_appendices.pdf)

<sup>15</sup> See Order R5-2019-0077, Attachment A, page 10:  
[https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2019-0077.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2019-0077.pdf)

5. The MND relies on the 2019 GBP WDR which includes an acute selenium objective of 20 ppb selenium for Mud Slough (North). We note that the USEPA did not include an acute selenium criterion in their July 13, 2016, Final updated Clean Water Act section 304(a) recommended national aquatic life criterion for the pollutant selenium. Under Item IV EPA found that, “*The criterion document does not include an acute criterion (based on water-only exposure) because selenium is bioaccumulative and toxicity primarily occurs through dietary exposure.*”<sup>16</sup> (emphasis added)
6. The dredging of potentially contaminated sediment: The SLDMWA proposes to remove sediment from Mud Slough and to remove and/or modify various dikes and levees. Yet, detailed sediment analysis is not provided in the MND nor are these materials proposed to be tested before dredging commences. The public and regulatory agencies are left in the dark regarding potential contaminants (including high levels of selenium and other pollutants) in these sediments that could be remobilized into adjacent water ways and wetlands. Any potential pathway for these contaminants to reach surface and groundwater must be disclosed and its impacts and their mitigation addressed.
7. A new Mud Slough Diversion Structure that will span the entire width of Mud Slough with a crest elevation of 8 feet and 80 feet wide, capable of holding back all the flows of Mud Slough with accumulation of water, ponding and inundation planned upstream has the potential for serious impacts to adjacent to federal and state wildlife refuges and wetlands. These impacts have not been disclosed nor analyzed. The exposure of waterfowl to elevated selenium and other contaminants from this ponding and flooding must be disclosed and its impacts and their mitigation addressed.<sup>17</sup>
8. Mitigation measures or alternatives including the continued delivery of water to these wetland areas were not considered along with the obligation of the Grassland Drainers/SLDMWA to obtain a NPDES permit to ensure discharges from the San Luis Drain to Mud Slough upstream of the proposed streambed alteration meet at least the US EPA’s revised chronic selenium criterion for lentic waters of 1.5 ppb (monthly mean)<sup>18</sup> or the 2 ppb monthly mean selenium objective for the Grassland wetland supply channels.<sup>19</sup>

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<sup>16</sup> See: <https://www.federalregister.gov/documents/2016/07/13/2016-16585/recommended-aquatic-life-ambient-water-quality-criterion-for-selenium-in-freshwater>

<sup>17</sup> Ponding upstream from flooding has poisoned birds. In “2003, a pasture at the existing upstream reuse area site attracted waterfowl when it was inadvertently flooded. This flooded area created ideal ecological conditions for shorebird foraging and nesting and thus, a number of pairs responded opportunistically and bred in the field. As a consequence, eggs collected near the pasture had highly elevated [selenium] concentrations.” A deliberate exposure of waterfowl to these poisonous waters is a significant impact that requires analysis. Creating this hazard is also a crime forbidden by the Migratory Bird Treaty Act, 16 U.S.C. section 703.

<sup>18</sup> See: <https://www.federalregister.gov/documents/2016/07/13/2016-16585/recommended-aquatic-life-ambient-water-quality-criterion-for-selenium-in-freshwater>

<sup>19</sup> See Table 3-1, page 3-3 of the Sacramento River Basin and San Joaquin River Basin Plan: [https://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/sacsjr\\_201805.pdf](https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf)



Mitigation measures in the MND are vague and fail to provide enforceable guidelines. This is especially important with regard to the quality of water that will be introduced to China Island and Newman Lake from Mud Slough once the streambed alteration is completed. Neither the quantity nor quality of the water is provided, analyzed or modeled in the MND. A brief narrative of water quality data from Mud Slough is provided in the MND Appendix B (Response to Comments)<sup>20</sup> and indicates that since July 2019 at least 13% of the water quality samples collected in Mud Slough exceeded 2 ppb selenium and one sample was above 5 ppb selenium. The actual water quality data for Mud Slough was not provided in the MND and water quality reports from the GBP are no longer posted on the web.<sup>21</sup>

The GBP WDR permits selenium concentrations in Mud Slough at levels that are toxic to fish and wildlife. Selenium at these levels kills juvenile salmon and steelhead, has been found to cause deformities in Sacramento splittail, and causes birth defects and reproductive impairment in birds that nest and feed along the shorelines and in the wetlands. Special-status species such as the State and federally-listed as threatened giant garter snake could be adversely affected by this project as they are vulnerable to selenium exposure through their aquatic diet. The MND's response to comments notes, *"Because the Project occurs within a State wildlife refuge managed by CDFW that provides habitat suitable for numerous special-status species, formal consultations with CDFW and the USFWS are planned and will occur following the submittal of permit applications to the regulatory agencies and prior to any Project construction."*<sup>22</sup> Yet these formal consultations have not been made available to the public nor have they been included with the MND.

The Mud Slough Restoration Project as defined in the MND would introduce more than 1,500 acre-feet/year of water from Mud Slough to replace the low-selenium well water currently used to provide water for wetlands in China Island and Newman Lake. Stormwater flows in Mud Slough can contain groundwater contaminants including selenium and should not be viewed as suitable for wetlands water supply. To protect the fish and wildlife beneficial uses of these public and private wetlands in the North Grasslands, we urge you to require that water quality provided to China Island and Newman Lake meet the USEPA the US EPA's revised chronic selenium

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<sup>20</sup> See pgs 33-34 of Attachment A to MND (Response to Comments):

[https://www.sldmwa.org/OHTDocs/pdf\\_documents/Meetings/Board/Prepacket/AgendaItem11\\_AgendaItem12\\_2021\\_1119\\_GBD\\_Mud\\_Slough.pdf](https://www.sldmwa.org/OHTDocs/pdf_documents/Meetings/Board/Prepacket/AgendaItem11_AgendaItem12_2021_1119_GBD_Mud_Slough.pdf)

<sup>21</sup> The most recent GBP water quality report available at the SFEI website for the GBP is from 2019:

[https://www.sfei.org/sites/default/files/general\\_content/Final%20GBP%20Monthly%20Report%20January-December%202019.pdf](https://www.sfei.org/sites/default/files/general_content/Final%20GBP%20Monthly%20Report%20January-December%202019.pdf)

<sup>22</sup> See pg 28 of Attachment A to MND (Response to Comments):

[https://www.sldmwa.org/OHTDocs/pdf\\_documents/Meetings/Board/Prepacket/AgendaItem11\\_AgendaItem12\\_2021\\_1119\\_GBD\\_Mud\\_Slough.pdf](https://www.sldmwa.org/OHTDocs/pdf_documents/Meetings/Board/Prepacket/AgendaItem11_AgendaItem12_2021_1119_GBD_Mud_Slough.pdf)

criterion for lentic waters of 1.5 ppb (monthly mean)<sup>23</sup> or the 2 ppb monthly mean selenium objective for the Grassland wetland supply channels.<sup>24</sup>

The SLDMWA Mitigated Negative Declaration does not meet CEQA requirements for a 401 Certification permit nor does it comply with the CWA enforcement and monitoring provisions. We request you require a complete EIR/EIS analysis before taking any action on the request for this permit to ensure state, federal and private refuge wetland resources are protected. There is no NEPA compliance for this project. The 2019 the EA conducted for the use by the Grassland Drainers of the federal San Luis Drain, does not consider, analyze, describe or provide mitigation with regard to the introduction of this San Luis Drain water conveyed through to Mud Slough (North) to the China Island Wildlife area or Newman Lake wetland areas.

Thank you for your consideration.

Sincerely,



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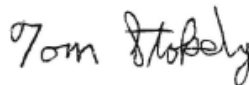
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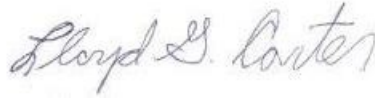
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<sup>23</sup> See: <https://www.federalregister.gov/documents/2016/07/13/2016-16585/recommended-aquatic-life-ambient-water-quality-criterion-for-selenium-in-freshwater>


<sup>24</sup> See Table 3-1, page 3-3 of the Sacramento River Basin and San Joaquin River Basin Plan:  
[https://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/sacsjr\\_201805.pdf](https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf)



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