

WATER QUALITY STANDARDS FOR SALINITY
COLORADO RIVER SYSTEM

Prepared by
Colorado River Basin Salinity Control Forum

1999

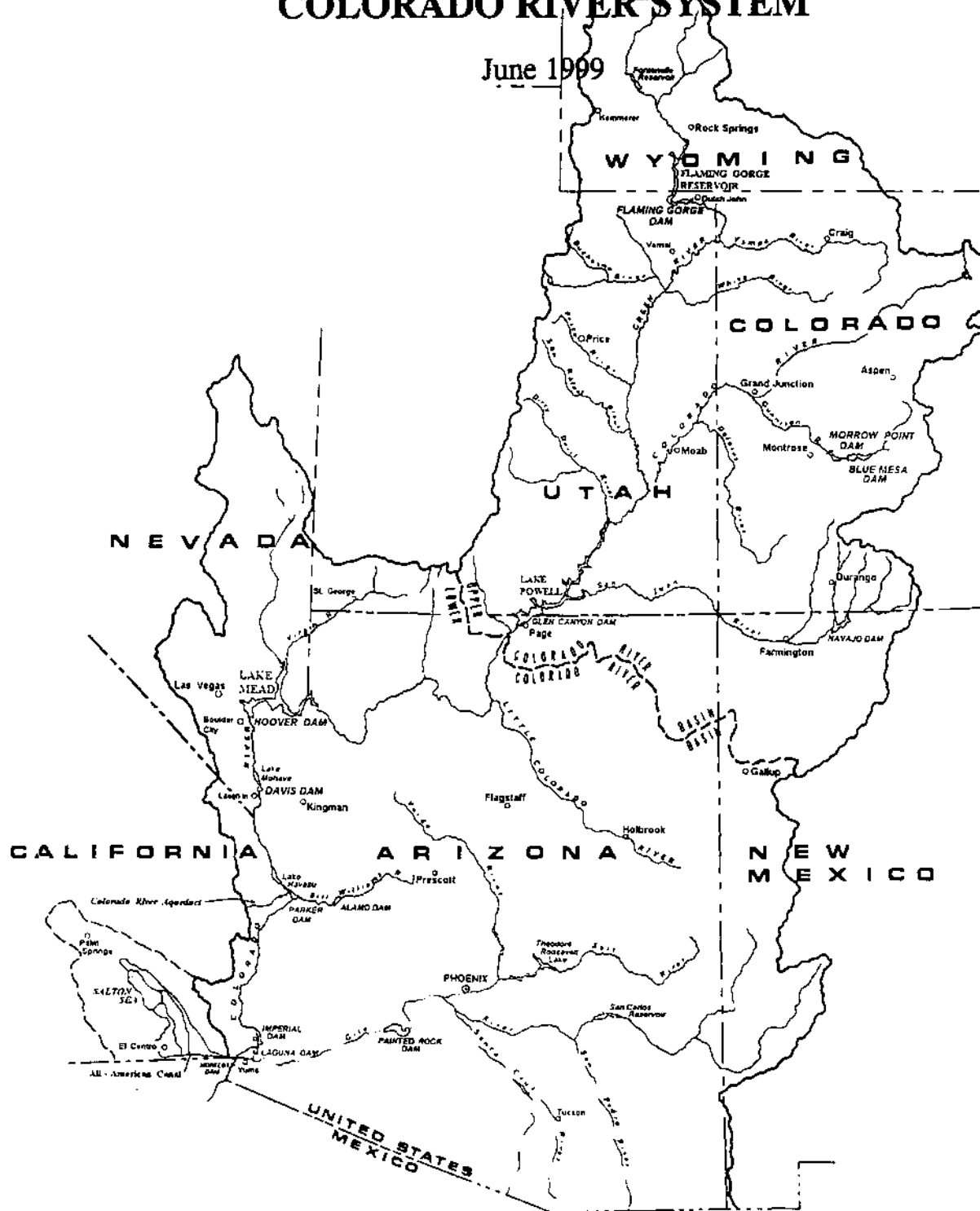
NOTE – This Review is composed of two parts, namely:

- 1) 1999 Review, *Water Quality Standards for Salinity, Colorado River System*, dated June 1999
- 2) Supplement Including Modifications to the *1999 Review, Water Quality Standards for Salinity, Colorado River System*, dated October 1999

1999 REVIEW

WATER QUALITY STANDARDS FOR SALINITY COLORADO RIVER SYSTEM

June 1999



Colorado River Basin Salinity Control Forum

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1999 REVIEW

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COLORADO RIVER SYSTEM**

June 1999

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Colorado River Basin Salinity Control Forum

COLORADO RIVER BASIN SALINITY CONTROL FORUM

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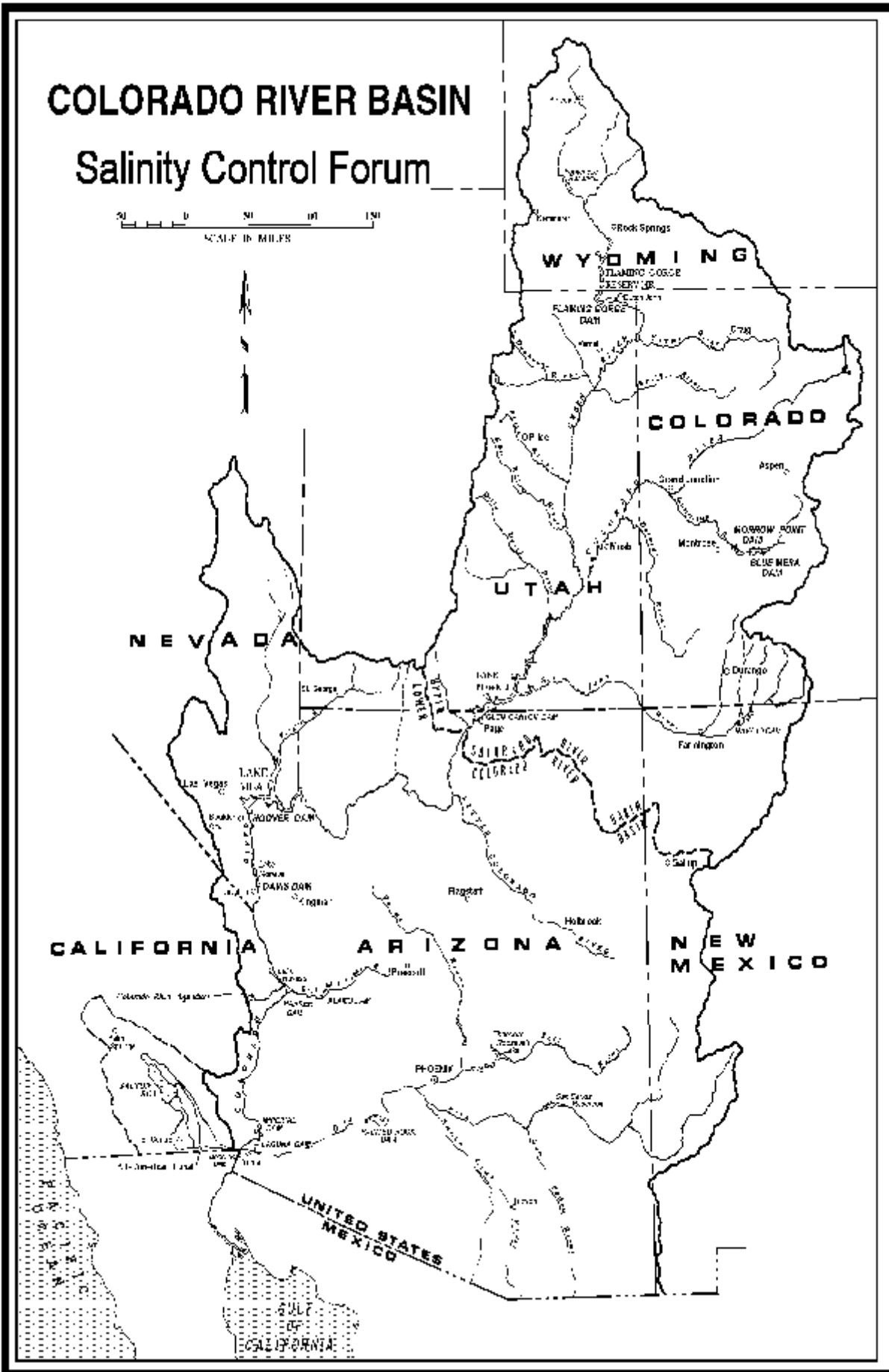
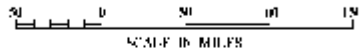
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Salinity Control Forum



TRANSMITTAL LETTERS

The Federal Water Pollution Control Act requires that at least once every three years the Colorado River Basin states review water quality standards relating to the salinity of the waters of the Colorado River. The states collectively initiated this review under the auspices of the Colorado River Basin Salinity Control Forum, prepared a preliminary report; and after holding public meetings, the Forum prepared a final report.

Upon the Forum's adoption of the final report, it is transmitted by letter to the governors of the individual states for their independent action. The following governors in each of the seven Colorado River Basin states shall receive this report:

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Honorable Gary E. Johnson
Governor of New Mexico
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Honorable Gray Davis
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Honorable Mike Leavitt
Governor of Utah
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Honorable Bill F. Owens
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SUMMARY

Section 303 of the Clean Water Act requires that water quality standards be reviewed from time to time, but at least once during each three-year period. Accordingly, the seven-state Colorado River Basin Salinity Control Forum (Forum) has reviewed the existing state-adopted and Environmental Protection Agency (EPA)-approved water quality standards for salinity consisting of numeric criteria and a plan of implementation for salinity control for the Colorado River System. Since the issuance of the 1996 Review, the U.S. Bureau of Reclamation (Reclamation) has initiated development of a new model to analyze the Colorado River System, including salinity. The model development is not yet completed, and new salinity projections are not available for this Review. Projections developed for the 1996 Review are used in this Review. This 1999 Review updates funding and salinity control component implementation requirements following 1999. Also, since the 1996 Review, federal legislation has been implemented which allows the Basin states to cost share up-front in both Reclamation's Basinwide Program and the U.S. Department of Agriculture's EQIP program. This has brought a new and important source of funding to the program and has accelerated the rate of implementation of salinity control measures. Federal authorization given by Congress in 1996 has already allowed for the addition of \$6,476,000 to the effort. The Forum's recommendations are to be submitted to each of the Basin states for consideration at a public hearing prior to adoption.

The Forum recommends no change in the numeric salinity criteria at the three stations located on the lower mainstem of the Colorado River. The numeric criteria at these stations will remain:

<u>Station</u>	<u>Salinity in mg/L¹</u>
Below Hoover Dam	723
Below Parker Dam	747
At Imperial Dam	879

The plan of implementation as set forth in this Review is designed to meet the objective of maintaining the salinity concentrations at or below the numeric criteria while the Basin states continue to develop their compact-apportioned waters. The plan is based on maintaining the numeric criteria under a long-term mean water supply of 15 million acre-feet annually at Lee Ferry, the Compact Point. The Forum recommends that the plan of implementation described in this report be carried out. The plan of implementation includes:

1. Completion of Reclamation, Bureau of Land Management (BLM), and U.S. Department of Agriculture (USDA) salinity control measures to the extent that each unit remains viable and appropriately cost-effective.

¹Flow-weighted average annual salinity.

2. Implementation of the Forum's recommended and adopted policies for effluent limitations, principally under the National Pollutant Discharge Elimination System (NPDES) permit program established by Section 402 of the Clean Water Act as amended. The implemented policies (included in Appendix B of this Review) are the following:

"Policy for Implementation of Colorado River Salinity Standards Through the NPDES Permit Program;"

"Policy for Use of Brackish and/or Saline Waters for Industrial Purposes;"

"Policy for Implementation of the Colorado River Salinity Standards Through the NPDES Permit Program for Intercepted Ground Water;" and

"Policy for Implementation of the Colorado River Salinity Standards Through the NPDES Permit Program for Fish Hatcheries."

3. Implementation of nonpoint source management plans developed by the states and approved by EPA.

Item 1 of the plan listed above is to be implemented by federal agencies in conjunction with state, local, and private participants. The Forum works jointly with federal agencies on developing measures to be implemented. The Forum also urges Congress to ensure that the funds necessary to successfully fulfill this plan of implementation are appropriated as needed. Items 2 and 3 above are primarily implemented by each of the Basin states.

Major components of this Review's plan of implementation are the federal programs. Table 1 summarizes the salinity control achieved by federal participants through 1998, and the salinity control measures which must be implemented to meet the goal of approximately 1.477 million tons of salt-load reduction annually through 2015. As 1.105 million tons of salt load reduction was required by 1998, and only 721,000 tons of salt load reduction was achieved, a shortfall of 384,000 tons must be made up. In order to do so, the Forum recommends that salinity control be accelerated to remove 87,000 tons/year through 2005. This includes removing at least 64,000 tons/year over the next six years, through the funding recommendations herein, to eliminate the shortfall, and 23,000 tons/year through the remaining period to maintain the numeric criteria through 2015. The federal programs are described in detail in Chapter 4 of this Review.

The plan of implementation is designed to control enough salt to maintain the numeric criteria under a long-term mean water supply of 15 million acre-feet per year. It is recognized that the river system is subject to highly variable flows. Consequently, salinity will vary from year to year and may temporarily exceed the adopted numeric criteria in some years and remain well below the criteria in others.

Table 1
Colorado River Basin Salinity Control Program
Plan of Implementation
By 2015
(Values in Tons of Salt Load Reduction Per Year)

AGENCY	MEASURES IN PLACE	POTENTIAL NEW MEASURES	TOTAL
Bureau of Reclamation	421,000	501,000	922,000
U.S. Department of Agriculture	262,000	242,000	504,000
Bureau of Land Management	38,000	13,000	51,000
TOTAL	721,000	756,000	1,477,000

Salinity concentrations at the three stations on the Lower Colorado River in 1997 were:

Station	Salinity Concentration¹ in mg/L
Below Hoover Dam	588
Below Parker Dam	609
At Imperial Dam	713

Based on the data available, the Forum concludes that the measured salinity will not exceed the numeric criteria during the next three years. The plan of implementation adopted herein by the Forum provides for the control of about 1.477 million tons of salt load reduction annually by the year 2015.

Should more water development projects be completed than are projected to occur before salinity control measures are identified or brought on line, temporary increases above the numeric criteria could result. However, these increases will be deemed in conformance with the standards if appropriate salinity control measures are included in the plan.

Increases above the criteria as a result of below normal annual river flows and/or low reservoir storage conditions will also be considered in conformance with the standards, provided that when river

¹Flow-weighted data based on 1997 provisional records.

flows return to normal, and satisfactory reservoir conditions prevail, concentrations will then be at or below the criteria level.

The Forum has reviewed the impact of the program on projected salinities and finds that through the year 2015 the plan will control salinity levels so that, with long-term mean water supply conditions, salinity levels will be below the numeric criteria at the three stations. The salinity standards provide protection from long-term increases in economic damage to downstream users.

Because of the long lead-time required to conduct salinity studies; complete environmental and feasibility reports; implement; and achieve full salinity reduction effects at the lower Colorado River mainstem stations, continued funding is necessary for the recommended plan of implementation to proceed as set forth in this Review. Non-federal funds, including Basin states' basin funds, are available to cost-share with federal appropriations, and Basin irrigators stand ready with cost-share dollars to install salinity reducing measures.

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List of Abbreviations

208 Plan	Section 208 of the Clean Water Act amendments of 1972 and 1977 requiring integrated area-wide plans and programs for dealing with water pollution problems
ADEQ	Arizona Department of Environmental Quality
AWT	Advanced Waste Treatment
BCC	Nevada's Clark County Board of Commissioners
BLM	United States Bureau of Land Management
BMI	Basic Management Inc.
CCSD	Clark County Sanitation District
CLV	City of Las Vegas
CNLV	City of North Las Vegas
CRM	Coordinated Resource Management (group)
CRSS	Colorado River Simulation System
CSCB	Colorado Soil Conservation Board
CWA	Clean Water Act
DEQ	Wyoming Department of Environmental Quality
DPA	Designated Planning Agency
EPA	Environmental Protection Agency
EQIP	Environmental Quality Incentives Program
ESI	Ecological site inventory
FAIRA	Federal Agriculture Improvement and Reform Act (P.L. 104-127) (1996)
Forum	Colorado River Basin Salinity Control Forum
FY	The federal government's Fiscal Year
HMA	Herd Management Area
IBWC	International Boundary and Water Commission
MGD	Million gallons per day
mg/L	milligrams per liter
NACOG	Northern Arizona Council of Governments
NDEP	Nevada Division of Environmental Protection
NEPA	National Environmental Policy Act
NMWQMP	New Mexico Water Quality Management Plan
NPSMP	Nonpoint Source Management Plan (New Mexico)
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRI	National Resource Inventory
ppm	parts per million
Reclamation	U.S. Bureau of Reclamation (USBR)
RMHQ	Requirements to Maintain Higher Quality (in Nevada)
RO	Regional Office
SRF	State Revolving Fund (EPA low-interest loans for non-point sources)
TDS	Total dissolved solids
The Act	The Colorado River Basin Salinity Control Act (P.L. 93-320) (1974), as amended by P.L. 98-569 (1984), and P.L. 104-20 (1995).
TMDL	Total Maximum Daily Load
T/AF	Tons per Acre-foot

UIC	Underground Injection Control (EPA)
USBR	United States Bureau of Reclamation
USDA	United States Department of Agriculture
USFWS	United States Fish & Wildlife Service
USGS	United States Geological Survey
UWA	Unified Watershed Assessment (part of Clean Water Action Plan)
WACOG	Western Arizona Council of Governments
WLA	Waste Load Allocation
WQCC	Water Quality Control Commission (Colorado)

CHAPTER 1 - INTRODUCTION

Purpose of Report

This report, the 1999 Review, Water Quality Standards for Salinity, Colorado River System (Review) is prepared and submitted in response to Section 303(c) of the Clean Water Act¹. Prepared by the seven-state Colorado River Basin Salinity Control Forum (Forum), on behalf of the governors of their respective states, this Review of the water quality standards includes the numeric criteria and the plan of implementation developed and adopted by the Forum. It also includes modifications to previous reviews that have become necessary as a result of changed conditions and the availability of additional information. This Review is the eighth triennial review conducted by the Forum. Section 303(c)(1) of the Clean Water Act requires that:

The governor of a state or the state water pollution control agency of such state shall from time to time (but at least once each three-year period beginning with the date of enactment of the Federal Water Pollution Control Act Amendments of 1972) hold public hearings for the purpose of reviewing applicable water quality standards and, as appropriate, modifying and adopting standards. Results of such review shall be made available to the Administrator.

This Review is consistent with the Environmental Protection Agency (EPA)-approved 1975 standards and deals only with that portion of the Colorado River Basin above Imperial Dam. While this Review will recap past events in an abridged format, its focus is on information gathered since issuance of the 1996 Review. Background information and activities regarding historical actions relative to the development and adoption of salinity standards is contained in the June 1975 standards report². The prior seven Reviews, from 1978 to 1996, contain more specific information on the seven 3-year periods.

Below Imperial Dam, salinity is controlled as a federal responsibility to meet the terms of the agreement with Mexico contained within Minute No. 242 of the International Boundary and Water Commission (IBWC), entitled "Permanent and Definitive Solution to the International Problem of the Salinity of the Colorado River." Minute No. 242 requires that measures be taken to assure that Colorado River water delivered to Mexico upstream from Morelos Dam will have an average annual salinity concentration of no more than 115 ± 30 parts per million (ppm) total dissolved solids (TDS) higher than the average annual salinity concentration of Colorado River water arriving at Imperial Dam.

¹Public Law [P.L.] 92- 500 as amended by P.L. 95- 217 and P.L. 100- 4

²Water Quality Standards for Salinity, Including Numeric Criteria and Plan of Implementation for Salinity Control, Colorado River System, Colorado River Basin Salinity Control Forum, June 1975.

Nothing in this report shall be construed to alter, amend, repeal, interpret, modify, or be in conflict with the provisions of the Boulder Canyon Project Act (45 Stat. 1057), the Boulder Canyon Project Adjustment Act (54 Stat. 774), the Colorado River Basin Project Act (82 Stat. 885), the Colorado River Compact, the Colorado River Storage Project Act (70 Stat. 105), the Upper Colorado River Basin Compact, or the Treaty with the United Mexican States (Treaty Series 994).

History and Background

In the 1960's and early 1970's, the seven Colorado River Basin states¹ and representatives of the Federal Government discussed the problem of salinity levels increasing in the lower reaches of the Colorado River. In 1972, the Federal Government enacted the Clean Water Act which mandated efforts to maintain water quality standards in the United States. At the same time, Mexico and the United States were discussing the increasing salinity of Colorado River water being delivered to Mexico.

The Basin states established the Colorado River Basin Salinity Control Forum in 1973. The Forum is composed of representatives from each of the seven Basin states appointed by the governors of the respective states. The Forum was created for interstate cooperation and to provide the states with the information necessary to comply with Section 303(a) and (b) of the Clean Water Act.

Congress enacted the Colorado River Basin Salinity Control Act (P.L. 93-320) (the Act) in June of 1974 with the Forum's support. Title I of the Act addresses the United States' commitment to Mexico and provided the means for the United States to comply with the provisions of Minute No. 242. Title II of the Act created a water quality program for salinity control in the United States. Primary responsibility for the federal program was given to the Secretary of the Interior, with the Bureau of Reclamation (Reclamation) being instructed to investigate and build several salinity control units. The Secretary of Agriculture was instructed to support the effort within existing authorities (see Chapter 4 for more detail regarding these authorities).

The EPA promulgated a regulation in December 1974, which set forth a basinwide salinity control policy for the Colorado River Basin. The regulation specifically stated that salinity control was to be implemented while the Basin states continue to develop their compact-apportioned water. This regulation also established a standards procedure, and required the Colorado River Basin states to adopt and submit for approval to the EPA water quality standards for salinity, including numeric criteria and a plan of implementation, consistent with the policy stated in the regulation. A copy of the regulation is included in Appendix A.

¹The seven Colorado River Basin states (Arizona, California, Colorado, Nevada, New Mexico, Utah and Wyoming) are referred herein as the "Basin states."

The Basin states, acting through the Forum, initially responded to this regulation by developing and submitting to the EPA a report entitled Water Quality Standards for Salinity Including Numeric Criteria and Plan of Implementation for Salinity Control - Colorado River System dated June 1975. Since the states' initial adoption, the water quality standards have been reviewed every three years (1978, 1981, 1984, 1987, 1990, 1993 and 1996) as required by Section 303(c)(1) of the Clean Water Act.

The Colorado River Basin Salinity Control Act was amended in 1984 by P.L. 98-569 to authorize two additional units for construction by Reclamation. The amendments directed the Secretary of the Interior and the Secretary of Agriculture to give preference to the salinity control units with the least cost per unit of salinity reduction. The Act was also amended to establish a voluntary on-farm salinity control program to be implemented by the Department of Agriculture and provided for voluntary replacement of incidental fish and wildlife values foregone on account of the on-farm measures. Many cost-effective salt-load reducing activities were accomplished in the decade following that authorization. P.L. 98-569 also directed the Bureau of Land Management (BLM) to implement salinity controls.

Reclamation and the Forum, in 1994, concluded that the existing Act, as amended, with its unit-specific approach and authorization ceiling, was limiting salinity control opportunities. In 1995, the Act was amended by P.L. 104-20 to authorize an entirely new way of implementing salinity control. Reclamation's new Basinwide Salinity Control Program opens the program to competition through a public process and has greatly reduced the cost of salinity control. An additional \$75 Million of expenditures by Reclamation were authorized by P.L. 104-20.

The Federal Agriculture Improvement and Reform Act (FAIRA) of 1996 (P.L. 104-127) further amended the U.S. Department of Agriculture's (USDA) role in salinity control by creating a new conservation program known as the Environmental Quality Incentives Program (EQIP) which combined four conservation programs, including USDA's Colorado River Basin salinity control program. FAIRA provided authority for funding the nationwide EQIP through the year 2002. USDA has created rules and regulations concerning how EQIP funds are to be allocated. The past authority for the states to cost-share from the Basin funds was retained in the new EQIP program with linkage to Reclamation's authority to distribute Basin funds for cost-sharing.

Figure 1-1 displays a cumulative estimation of the annual salt removal by the Colorado River Basin salinity control program.

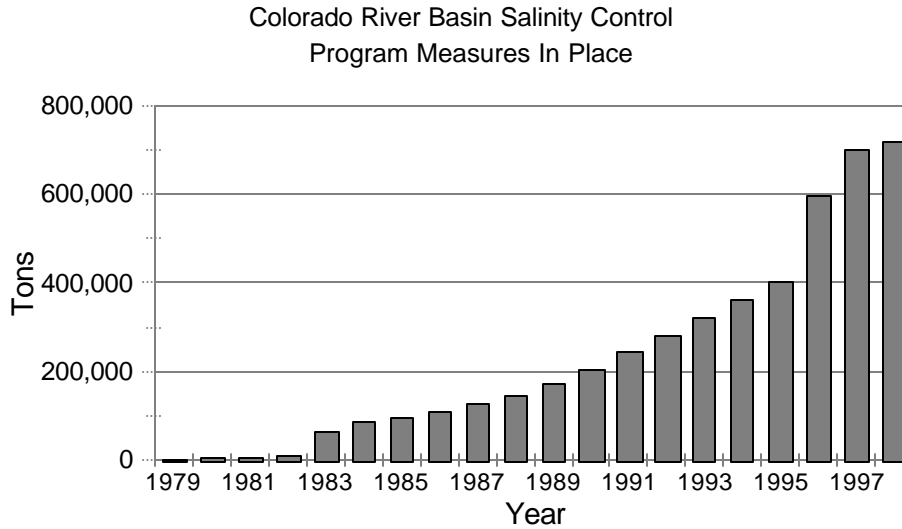


Figure 1-1

Overview of Standards

The Forum proposed, the states adopted, and the EPA approved water quality standards in 1975, including numeric criteria and a plan of implementation, to control salinity increases. The standards require that a plan be developed which will maintain the flow-weighted average annual salinity at or below the 1972 levels while the Basin states continue to develop their compact-apportioned water supply. The Forum selected three stations on the mainstem of the lower Colorado River as being appropriate points to measure the salinity of the Colorado River. These stations are located at the following points on the Colorado River: (1) below Hoover Dam; (2) below Parker Dam; and (3) at Imperial Dam. Numeric criteria were established for these points as required by the 1974 regulation. A plan of implementation was also developed in 1975 by the Forum and participating federal agencies as part of the standards. It was designed to ensure compliance with the numeric criteria for salinity. The numeric criteria and plan of implementation are further described in Chapters 3 and 4 of this Review. During each triennial review, the numeric criteria are reviewed and the plan of implementation is updated to ensure continuing compliance with the standards.

The Colorado River water quality standards for salinity, and the approach taken by the Basin states in complying, are unique. The Forum relied on the Basin states' projections of use of compact-apportioned waters. The salinity projections are based on the long-term mean water supply of 15 million acre-feet per year. The plan of implementation is revised as necessary to ensure compliance with the standards.

Program Funding

Adequate funding is required to meet the standards. Funds are provided from federal and non-federal sources. Federal appropriations, Basin states cost-share funds, and local participant funds are used to implement the Colorado River Basin Salinity Control Program. The Basin states and the local producers have funds available and stand ready to implement the program called for in this report.

Figure 1-2 shows federal appropriations for the Colorado River Basin salinity control program over the past twelve years. Annual appropriations to Reclamation were as large as \$34,566,000 as recently as 1992, but in 1998 they were only \$7,600,000. Because of improved cost effectiveness, the Basin states believe the appropriation to Reclamation can be smaller than in the past, but find that about \$17,500,000 is needed each year through the planning period of this report. An increased funding ceiling is now needed for the Reclamation program.

Following the passage of FAIRA in 1996, federal funding is provided to USDA each year for

Historic Federal Funding Levels

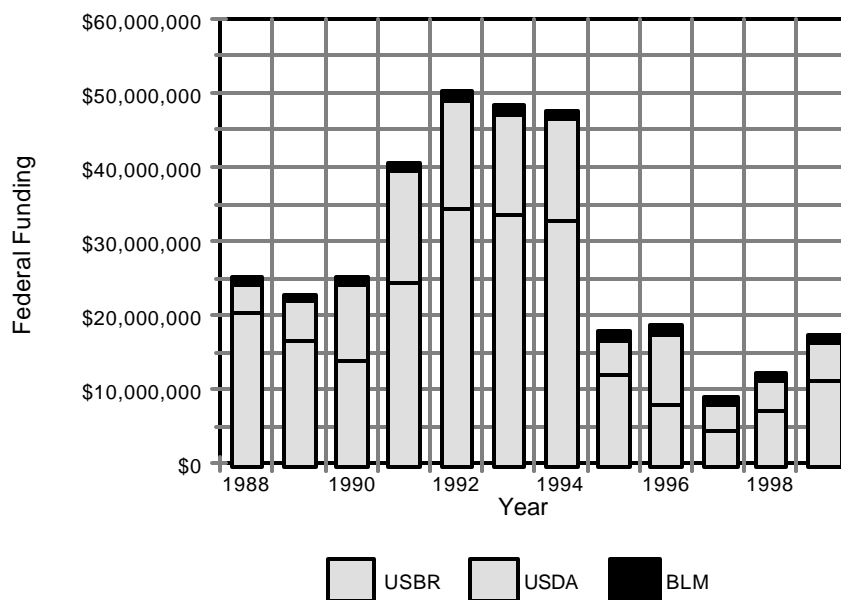


Figure 1- 2

distribution for environmental enhancement efforts through the nationwide EQIP. In 1991 and 1992, when salinity control was a separate line-item, \$14,783,000 was made available to the USDA's Colorado River Basin salinity control program by Congress, but in 1998 and 1999 USDA allocated only \$3.9 million and \$5.1 million. A solution to this under-funding problem is for USDA to designate the Colorado River Basin as a national conservation priority area and increase funding to the Colorado River salinity control activities of EQIP to \$12 Million per year.

BLM has an important role to play in controlling salt contributions from nonpoint sources from the very sizeable amount of federal land it manages. Accounting procedures used by BLM have not allowed for an analysis to occur as to expenditures for salinity controls measures being implemented by the agency. Recent efforts by BLM staff to determine the effects of management practices being implemented is providing new information and it is hoped that in the near future BLM accomplishments can be estimated and the adequacy of the effort and the level of funding for the activities can be evaluated.

The EPA has programs that give financial assistance to the states to implement nonpoint source pollution control efforts. Recently, the federal assistance has been increased and now the salinity control effects of these efforts need to be evaluated.

CHAPTER 2 - SALINITY OF THE RIVER

Overview

The Colorado River drains 246,000 square miles (approximately 157 million acres) of the western United States and a small portion of northern Mexico. Its waters serve some 5.5 million people within the United States' portion of the Colorado River Basin, and through export provides full or supplemental water supply to another 22.3 million people outside the Basin. The regional economy is based on irrigated agriculture, livestock grazing, mining, forestry, manufacturing, oil and gas production, recreation and tourism. About 3.5 million acres are irrigated within the Colorado River Basin and hundreds of thousands of additional acres are irrigated by waters exported from the Basin. Hydroelectric power facilities along the Colorado River and its tributaries generate approximately 12 billion kilowatt-hours annually which is used both inside and outside of the Basin. The Colorado River also serves about 2.3 million people and 500,000 irrigated acres in Mexico.

Salinity has long been recognized as one of the major problems of the river. The Colorado, like most western rivers, increases in salinity from its headwaters to its mouth, carrying an average salt load of approximately nine million tons annually past Hoover Dam, the uppermost location at which numeric criteria have been established. In addition to total salt load which measures the total mass of salt carried in the River (tons/year), this report also examines salinity in terms of concentration as expressed in milligrams per liter (mg/L).

The salts in the Colorado River system are indigenous and pervasive. Many of the saline sediments of the Basin were deposited in prehistoric marine environments. Salts deposited with the sedimentary rocks are easily eroded, dissolved, and transported into the river system. The Colorado River Basin Salinity Control Program is designed to prevent a portion of this abundant salt supply from moving into the river system.

In a 1971 study¹, the EPA analyzed salt loading in the Colorado River Basin and divided it into two categories, naturally occurring and human-caused. The EPA concluded that about half (47 percent) of the salinity concentration measured in water arriving at Hoover Dam is from natural causes including salt contributions from saline springs, ground water discharge into the river system (excluding irrigation return flows), erosion and dissolution of sediments, and the concentrating effects of evaporation and transpiration. The natural causes category also included salt contributions from nonpoint (excluding irrigated agriculture) or unidentified sources or from the vast, sparsely-populated regions of the drainage, much of which is administered by the BLM or other governmental agencies. Of the land within the Colorado River Basin, about 75 percent is owned and administered by the Federal Government or held in trust for Indian tribes. The greatest portion of the naturally-occurring salt load originates on these federally-owned and

¹The Mineral Quality Problem in the Colorado River, Summary Report, Environmental Protection Agency, Regions VIII and IX, 65 pp., 1971.

administered lands. Human activities can influence the rate of natural salt movement from rock formations and soils to the river system and include: livestock grazing, wildlife management, logging, mining, oil exploration, road building, recreation and urbanization.

Approximately 53 percent of the salinity concentration in the water arriving at Hoover Dam, as identified by EPA, results from various human activities. EPA estimated that out-of-Basin exports account for about 3 percent of the salt concentration at Hoover Dam, with irrigation accounting for 37 percent, reservoir evaporation and phreatophyte use accounting for about 12 percent, and about 1 percent attributed to municipal and industrial uses. Much of the salt load contribution from irrigated agriculture is from federally-developed irrigation projects.

Salinity control activities necessarily include a water quality monitoring and analysis component that provides basinwide information for program evaluation. The monitoring and analysis component provides an essential database for future studies, supports state and regional planning activities, and provides an objective basis for evaluating the effectiveness of salinity control measures.

Continuing evaluations of the salinity of the Colorado River are made by Reclamation, the U.S. Geological Survey (USGS) and the Bureau of Land Management (BLM). The results of several studies were published by the agencies during the period of this Review (1996-1999). To evaluate changes in salinity, water quality and streamflow data are obtained on a daily, weekly, monthly, and/or quarterly basis at various points on streams throughout the Basin by the USGS in cooperation (through financial and/or direct services) with private entities, the states and other federal agencies. Gaging stations in the Colorado River Basin which are of significance to the programs and for which streamflow and water quality records are available are shown on Figure 2-1.

Salinity data are based on total dissolved solids (TDS) as the sum of constituents, whenever possible. The sum of constituents values are defined to include calcium, magnesium, sodium, chloride, sulfate, a measure of the carbonate equivalent of alkalinity and, if measured, silica and potassium. If a sum of constituents value could not be computed, TDS as residue on evaporation (at 180 degrees Celsius) is substituted. Further, some reported salinity values are based on correlation with specific conductance measurements. In this Review, the terms "salinity," "TDS" and "concentration" in mg/L are used interchangeably.

Average annual salinity concentrations and salt loads are determined on the basis of a flow-weighted average annual salinity concentration. The flow-weighted average annual salinity is simply the concentration determined from dividing the annual total salt load passing a measuring station by the total annual volume of water passing the same point during a calendar year. The flow-weighted average annual salinity is calculated by first multiplying the daily concentration values by the daily flow rates. These values are then summed over a calendar year and then divided by the sum of the daily flow rates.

MONITORING STATIONS

- 1 Green River near Green River, WY
- 2 Green River near Greendale, UT
- 3 Yampa River near Maybell, CO
- 4 Duchesne River near Randlett, UT
- 5 White River near Watson, UT
- 6 Green River near Green River, UT
- 7 San Rafael River nr Green River, UT
- 8 Colorado River nr Glenwood Springs
- 9 Colorado River near Cameo, CO
- 10 Gunnison River near Grand Jct, CO
- 11 Dolores River near Cisco, UT
- 12 Colorado River near Cisco, UT
- 13 San Juan River near Archuleta, NM
- 14 San Juan River near Bluff, UT
- 15 Colorado River at Lees Ferry, AZ
- 16 Colorado River near Grand Canyon
- 17 Virgin River at Littlefield, AZ
- 18 Colorado River below Hoover Dam
- 19 Colorado River below Parker Dam
- 20 Colorado River at Imperial Dam

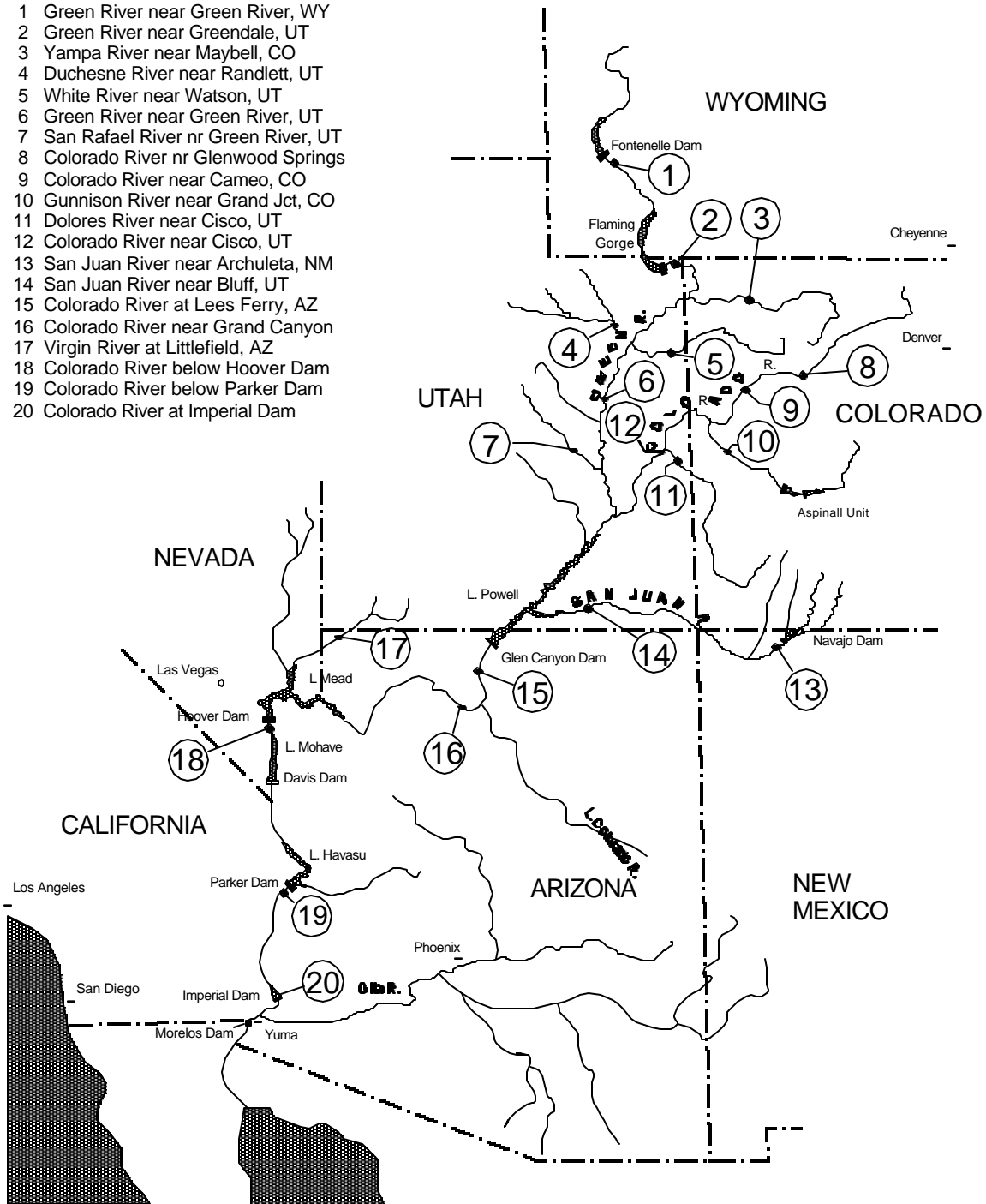


Figure 2-1.—Colorado River water quality monitoring stations.

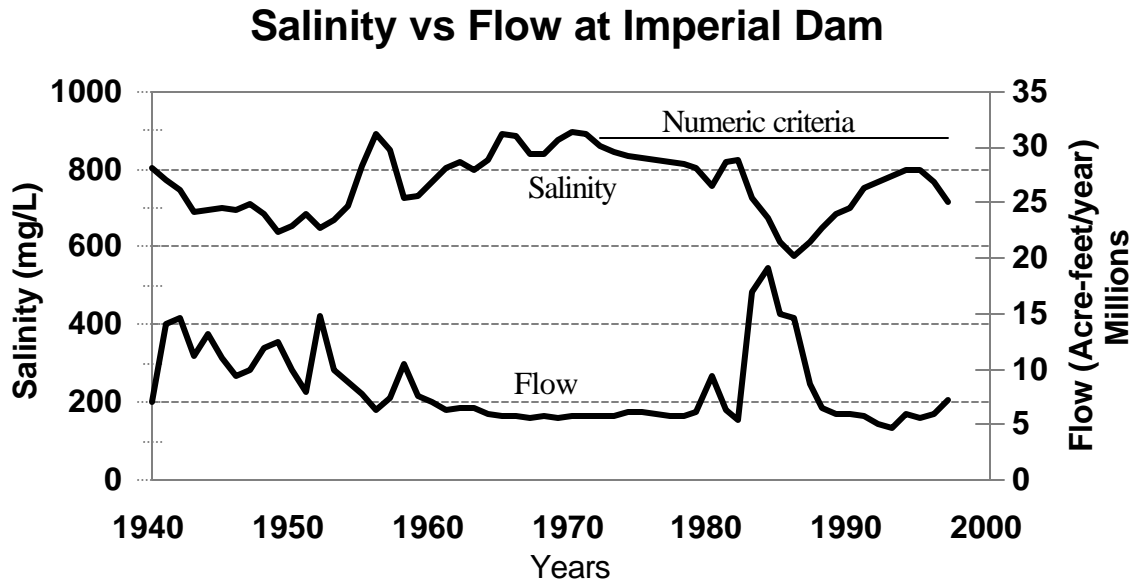


Figure 2-2

Observed Salinity

Salinity of the river has fluctuated significantly over the period of record (1941-1997; Figure 2-2). Salinity generally decreases in periods of high flow and increases in periods of low flow as can be seen in Figure 2-2.

Record high flows during the mid-1980's resulted in a reduction in salinity of approximately 250 mg/L at Imperial Dam. Conversely, the period from 1988 to 1992 was the driest five years of record historically observed. As a result, salinity in the River gradually increased. Table 2-1 shows the flow-weighted salinity from 1972 to 1997 below Hoover and Parker Dams, and at Imperial Dam.

Water Use and Associated Impacts of Salinity

The Colorado River, from its headwaters in the Rocky Mountains to its mouth in the Gulf of California, is utilized for a variety of purposes. A portion of the flow is transported out of the Colorado River Basin for use in adjacent river basins. In the Colorado River Basin, irrigation, municipal and industrial, hydroelectric power generation, power plant cooling, fish and wildlife, and recreation are the major uses of the water.

Table 2-1
Observed Flow-Weighted Average Salinity
at the Numeric Criteria Stations
 (Total Dissolved Solids in mg/L)¹

Calendar Year	Below Hoover Dam	Below Parker Dam	At Imperial Dam
1972	724	734	861
1973	675	709	843
1974	681	702	834
1975	680	702	829
1976	674	690	822
1977	665	687	819
1978	678	688	812
1979	688	701	802
1980	691	711	760
1981	681	716	821
1982	680	713	826
1983	658	678	727
1984	597	611	675
1985	556	561	615
1986	517	535	577
1987	519	538	612
1988	529	540	648
1989	564	559	683
1990	587	600	702
1991	629	624	749
1992	658	651	767
1993	660	631	784
1994	668	673	796
1995	655	665	797
1996 ²	619	648	768
1997	588	609	713

Colorado River water users in the Lower Basin have suffered significant economic impacts due to long-term continued use of water with elevated salinity levels. Figure 2-3 indicates salinity damages resulting from long-term continued use at various levels of salinity based on a 1988 Bureau of Reclamation (Reclamation) study. At current salinity levels, as shown in Figure 2-3, these damages are estimated to be in excess of \$600 million per year. The Metropolitan Water District of Southern California (Metropolitan)

¹Determined by the U.S. Geological Survey (USGS) from data collected by the U.S. Bureau of Reclamation and USGS and published in *Quality of Water, Colorado River Basin, Progress Report No. 19*, 1999

²Data for 1996 and 1997 based upon provisional records.

recently refined the estimate of salinity damages for its service area as an element of a Metropolitan-Reclamation Salinity Management Study. Considering this work, Reclamation is currently refining the estimate of salinity damages in other portions of the Lower Colorado River Basin.

Agricultural water users suffer economic damage as a result of using highly saline waters through reduced crop yields, added labor costs for irrigation management, and added drainage requirements. Urban users incur additional costs due to more frequent replacement of plumbing and water using appliances, use of water softeners and the purchase of bottled water. Industrial users and water treatment and waste water utilities incur reductions in the useful life of system facilities and equipment from higher levels of salinity.

A significant economic impact in the Lower Basin results from the regulatory restrictions imposed by local and regional water quality standards and management programs which protect ground water supplies. Regulatory agencies have placed restrictions on reuse or recharge of waters that exceed specified salinity levels. If the salinity levels of the Colorado River increase, these

regulatory actions result in additional expensive treatment of water prior to reuse or disposal instead of reuse of the waters. If disposal options are selected, additional costly water must be developed or imported to meet the demands previously met or that could be met by water reuse.

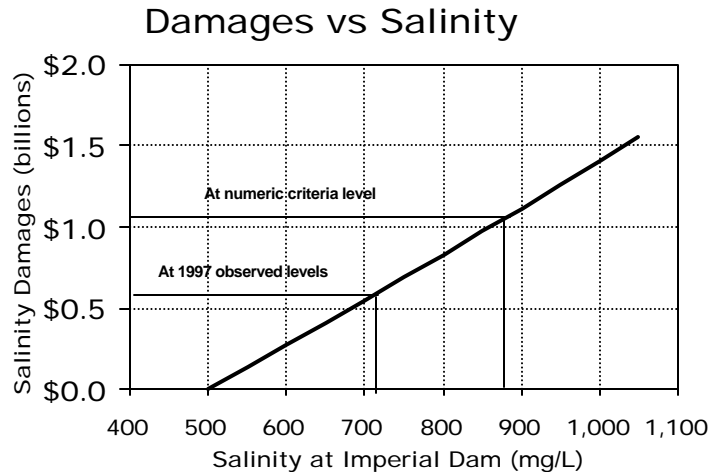


Figure 2-3

Projections

Future Water Depletions

One of the significant factors affecting salinity concentrations is water use. Estimates of projected water use through the year 2015 were developed by the Basin states for the 1996 Review. Table 2-2 presents a summary of these estimated water depletions in the Upper Colorado River Basin, and from the mainstem of the Lower Colorado River.

Table 2-2
Summary of Projected Normal Year Water Depletions in the
Colorado River Basin¹
(1,000 acre-feet)

	2000	2005	2010	2015
Upper Basin ²	3,935	4,103	4,270	4,380
Lower Basin ³	7,500	7,500	7,500	7,500
Total	11,435	11,603	11,770	11,880

Existing Salinity Conditions

The goal of the Colorado River Basin Salinity Control Program is to maintain the flow-weighted average annual salinity at or below the numeric criteria. The effort is not intended to counteract the salinity fluctuations that are a result of the highly variable flows caused by short-term climatic variations in temperature, precipitation, and snowmelt. Therefore, to evaluate the effectiveness of the Colorado River Basin Salinity Control Program, salinity data were analyzed and adjusted by removing the effects of these variations to better understand program effectiveness under long-term mean water supply conditions.

This adjusted data was used to evaluate whether current salinity control efforts are sufficient to meet the numeric criteria of the salinity standards under the current and projected levels of water development in the Basin. Table 2-3 compares the numeric criteria with the observed data and adjusted salinity levels at the three Lower Basin monitoring stations.

Figures 2-4, 2-5 and 2-6 summarize data from past Reclamation progress reports⁴, comparing the adjusted salinity (to reflect long-term mean water supply) to the numeric criteria.

¹Source: Depletion projections prepared by Basin States for CRSS salinity simulations (Oct. 1995).

²Depletions at point of use. Data do not include Colorado River Storage Project reservoir evaporation estimated by Reclamation to average 520,000 acre-feet per year under full development.

³Lower Colorado River mainstem only. Diversions from the mainstem less returns. Data do not include mainstem reservoir evaporation and stream losses.

⁴Quality of Water, Colorado River Basin, Progress Report, No. 1 through 19.

Table 2-3
Comparison of Salinity Concentrations to the Numeric Criteria
for the Existing Level of Water Development and Salinity Control

Station	Numeric Criteria (mg/L)	Adjusted Salinity ¹ (mg/L)	Observed Salinity ² (mg/L)
Colorado River below Hoover Dam	723	756	588
Colorado River below Parker Dam	747	775	609
Colorado River at Imperial Dam	879	882	713

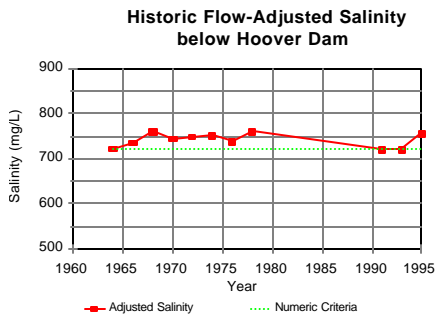


Figure 2- 4

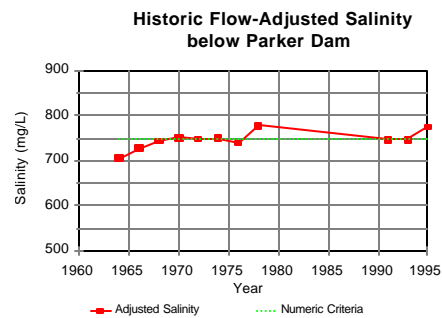


Figure 2- 5

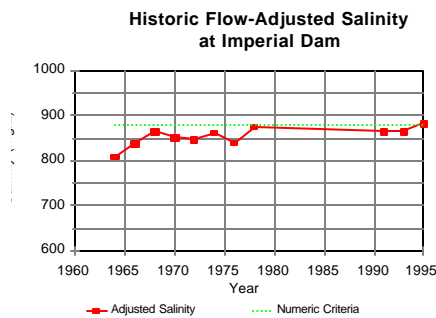


Figure 2- 6

¹Reflects salinity that would have occurred in 1995 from long-term mean water supply as computed by CRSS.

²1997 data based on provisional records.

at the three water quality stations through time. Adjusted salinity values were not computed for the period 1980 through 1990. The figures show that at times in the past adjusted salinity values were above the numeric criteria.

Future Salinity Projections

For past Reviews, salt-routing studies were conducted using the Colorado River Simulation System (CRSS) developed by Reclamation.¹ The CRSS is a package of computer models and databases developed by Reclamation as a tool for use by water resource managers dealing with water-related issues and problems in the Colorado River Basin. Previous studies were conducted to provide estimates of future flow-weighted average annual salinity concentrations for each year of the study period below Hoover and Parker Dams and at Imperial Dam in the Lower Basin.

Currently, Reclamation is developing a new model to analyze the Colorado River System, including salinity. This is an ongoing process that is intended to provide a better tool for projecting future salinity concentrations. Because the model is not completed, new projections are not available for this Review. Projections developed for the 1996 Review are used in this Review. This analysis determined the salinity program would need an estimated total of 1,477,000 tons of salinity control, as is shown in Table 2-4, in order to meet the numeric criteria in 2015 at the Hoover station. This represents 756,000 tons beyond the existing 721,000 tons of salinity control. This includes a shortfall of 384,000 tons of salinity control that were to be in place by 1998 to offset estimated development. Based on comments received during the 1996 Review, the Forum has determined that the shortfall should be eliminated as soon as possible and at least within the next six years. The plan of implementation has been developed to remove at least 87,000 tons/year through 2005. This includes 64,000 tons/year to eliminate the shortfall and the 23,000 tons/year needed to maintain the numeric criteria through 2015 (see page 4-2 for funding recommendations).

¹Detailed information on CRSS is presented in the following Reclamation reports: *Colorado River Simulation System, An Executive Summary* (October 1981); *Colorado River Simulation System, Users Manual* (June 1982); and *Colorado River Simulation System, System Overview* (1984).

**Table 2-4
Salinity Control Requirements**

1998 Salinity Control Requirements		
	Requirements	1,105,000 tons/year
	Measures in Place	721,000 tons/year
	Shortfall	384,000 tons/year
2015 Salinity Control Requirements		
	Requirements	1,477,000 tons/year
	Measures in Place through 1998	721,000 tons/year
	Plan of Implementation Target	756,000 tons/year

Future salinity concentrations will depend not only upon human activities but upon natural phenomena, such as runoff conditions, natural evapotranspiration, and dissolution and mixing within the major storage reservoirs. Even with full implementation of the Colorado River Basin Salinity Control Program's current Plan of Implementation which offsets the human impacts since 1972 and through 2015, the actual concentrations at the three numeric criteria stations (and elsewhere in the Basin) will continue to fluctuate in response to hydrologic conditions.

Exceedance Evaluation

A statistical analysis was performed for the 1996 Review and reproduced in this Review in order to determine the effectiveness of the program in maintaining the numeric criteria. The analysis evaluated four conditions of various levels of salinity control ranging from no controls to implementing the Plan. Data were developed which indicate the frequency of occurrence of various mean annual salinity concentrations. Provided the salinity control measures in the Plan of Implementation are in place, the mean annual flow-weighted salinity concentrations at the three lower mainstem stations would be at or below the numeric criteria, with Hoover Dam being the controlling station. This statistical analysis can be found in Appendix C of the 1996 Review.

Impacts of Hydrology

Beyond the exceedance percentages shown in Appendix C of the 1996 Review which show how often various salinity levels should be attained, it is important to understand that annual salinity concentrations may remain depressed or elevated for a period of time. The historical plot of salinity at Imperial Dam shown in Figure 2-2 earlier in this Review effectively demonstrates this.

Reclamation's CRSS model was also used to define how quickly salinity may increase or decrease from the present levels recently observed in the Colorado River system. The model simulations were made by setting the starting conditions to the observed level of salinity and storage in the reservoir system. The highest and lowest periods of record were selected out of the CRSS database to define these bounds. The model simulations were started with these critical periods and allowed to continue through the database for 20 years as an example of how salinity may vary (see Appendix C in the 1996 Review).

CHAPTER 3 - NUMERIC CRITERIA FOR SALINITY

Overview

As discussed earlier in this report, the EPA promulgated a regulation which set forth a basinwide salinity control policy for the Colorado River Basin. This policy required that the flow-weighted average annual salinity in the lower mainstem of the Colorado River be maintained at or below the 1972 levels. The Basin states, acting through the Forum, addressed this requirement in its first Review entitled Water Quality Standards for Salinity Including Numeric Criteria and Plan of Implementation for Salinity Control - Colorado River System dated June 1975.

In the 1975 Review, the Forum proposed three stations as appropriate points in the lower mainstem of the Colorado River at which to measure the flow-weighted average annual salinity. These stations are located at the following points: (1) below Hoover Dam; (2) below Parker Dam; and (3) at Imperial Dam.

In 1972, the flow-weighted average annual salinity for these stations were determined by Reclamation from daily flow and salinity data collected by USGS and Reclamation and became the numeric criteria. The criteria for each of those stations is as follows:

Below Hoover Dam	723 mg/L
Below Parker Dam	747 mg/L
At Imperial Dam	879 mg/L

There is no inference that 1972 was chosen as the basis for establishing the numeric criteria because that year represented a typical or average year. The basis for selecting these stations is their proximity to key diversion facilities on the lower Colorado River. The State of Nevada diverts Colorado River mainstem water from Lake Mead for use in the Las Vegas area, and its return flows move into the Lake and are part of the water supply available below Hoover Dam. The Metropolitan Water District of Southern California and the Central Arizona Project divert water from Lake Havasu, impounded behind Parker Dam, for many millions of water users in southern California and central Arizona. The large agricultural areas in the Imperial and Coachella Valleys in California and the Yuma area in Arizona and California are served by diversions made at Imperial Dam.

The criteria were established to protect infrastructure and crop production rather than human health or fish and wildlife values. The salinity concentrations that are anticipated in the future, even without salinity control efforts, have not been shown to have adverse effects on human health or wildlife. Thus, the Colorado River Salinity Control Program is different from most other water quality standards compliance programs.

Temporary Increases

The federal regulations provide for temporary increases above the 1972 levels if sufficient control measures are included in the plan of implementation. Should additional water development projects take place beyond those anticipated to occur before control measures are brought on line, temporary increases above the numeric criteria could result. However, these increases will be deemed to conform with the standards if appropriate salinity control measures are included in the plan.

The standards require that a plan be developed which will maintain the flow-weighted average annual salinity at or below the 1972 levels while the Basin states continue to develop their compact-apportioned water supply. The plan is not, however, intended to offset the salinity fluctuations that are a result of the River's highly variable annual flows (natural variations in the hydrologic cycle). Analyses have shown that the impact of natural variations in the hydrologic cycle can have a significant impact on salinity. These natural variations in runoff can cause a fluctuation in average annual salinity concentration of as much as 450 mg/L TDS at Imperial Dam. Recognizing the variability of the river flow, the plan for maintaining the criteria is developed using a long-term mean water supply of 15 million acre-feet. When river flows are at or above the long-term average annual flow, and reservoirs are full, then concentrations are expected to be at or below the numeric criteria. When evaluated using this assumption, the flow-weighted average annual salinity is maintained at all times at or below 1972 levels.

In addition to the highly variable annual flow, the frequency, duration, and availability of carryover storage greatly affect the salinity of the lower mainstem. Therefore, it is probable that salinity levels will exceed the numeric criteria in some years and be below the criteria in others. As long as adequate control measures are included in the plan, periodic increases in salinity above the criteria as a result of reservoir conditions or periods of below long-term average annual river flow will also be in compliance with the standards.

Provision for Reviewing and Revising Standards

The Forum, in its statement of "Principles and Assumptions for Development of Colorado River Salinity Standards and Implementation Plan," approved by the Forum on September 20, 1974, stated, under Principle 7:

"The plan of implementation shall be reviewed and modified as appropriate from time to time, but at least once every three years. At the same time, the (numeric) standards, as required by Section 303(c) (1) of P.L. 92-500 shall be reviewed for the purpose of modifying and adopting standards consistent with the plan so that the Basin states may continue to develop their compact-apportioned waters while providing the best practicable water quality in the Colorado River Basin."

The Forum took this position because the Colorado River Basin is a large and complex area with many problems. A wide range of research, technical studies and actions are underway, and much knowledge is yet to be gained. Procedures for reducing the volume of saline irrigation return flows have been developed. The USDA is implementing a voluntary cost-sharing program with individual farmers, irrigation districts, and canal companies in order to accomplish salt loading reductions to the river system by improving on-farm water management practices as well as water delivery and drainage systems.

A Work Group, created by the Forum, holds meetings on a more frequent basis than the Forum to review technical information which is generated by the federal agencies. Membership on the Work Group is composed of technical representatives from each of the Basin states and the Executive Director of the Forum. The Work Group keeps current with salinity control efforts and suggests revisions as appropriate. The Work Group operates under a schedule which enables the states to take action on any potential revision in a timely manner.

Review of the Numeric Criteria

Based on the Forum's statement quoted above, this document is the appropriate setting to review the numeric criteria and recommend any changes if necessary.

The existing numeric criteria were adopted nearly 25 years ago. Since then, the lower mainstem of the Colorado River has undergone many changes. While consumptive use by agriculture has remained at about 77 percent of the overall demand in the Lower Basin, there has been a shift from growing mostly low value salt tolerant crops to growing higher value, less salt tolerant crops. The need for water conservation and efficiency within the agriculture sector continues to put an emphasis on reducing salinity. Municipal and industrial sector uses remain at approximately 23 percent of the overall demand, but the actual use by this sector has increased by approximately 20 percent since 1972. Current trends would indicate increased use by this sector will continue. As this trend continues, the Lower Basin will likely see water moving from the agricultural sector to the municipal and industrial sector.

The numeric criteria were established in 1974 to prevent additional economic damage in the Lower Basin as the Upper Basin continued to develop. They were established based on the water use patterns in 1972. As those use patterns evolve over time, it is appropriate to review the numeric criteria to determine if they still adequately protect water uses in the Lower Basin. Both California and Arizona have begun to evaluate the effect of higher salinity on the municipal and industrial sectors in their states. Agricultural and municipal interests in California continue to pursue the movement of water from one sector to the other. As these efforts progress, it will continue to be appropriate to revisit the numeric criteria values associated with the water quality standards for salinity in the Colorado River system.

Based on the information contained in this Review, the ongoing progress toward, and status of, accomplishing all measures identified in the plan of implementation, as well as the current use patterns in the Lower Basin, the Forum finds the current numeric criteria are adequate and that no changes are required at this time.

CHAPTER 4 - PLAN OF IMPLEMENTATION

Overview

The purpose of the plan of implementation is to offset the effects of water resource development in the Colorado River Basin after 1972. The plan of implementation is not intended to address the salinity of the river caused by human activity prior to 1972, nor salinity caused by natural variations in river flows.

The Forum believes it should assess whether the plan of implementation maintains salinity at or below the numeric criteria through an interim point in time as the Basin states develop their compact-apportioned waters. Historically, the Forum designed the plan of implementation to maintain the numeric criteria for a period of 15-20 years (e.g., the 1990 Review contained a plan of implementation through the year 2010). For this Review, the plan of implementation has been designed to maintain the salinities of the Colorado River at or below the numeric criteria below Hoover Dam through the year 2015. The Hoover Dam station was chosen because this point requires the most salinity control to accommodate the numeric criteria through this time period.

The Forum determined that 1,477,700 tons of salt must be removed or prevented from entering the system annually to maintain the numeric criteria through 2015. The plan of implementation includes projects which remove the required salt tonnage. This will principally be accomplished by reducing the salt contributions to the River from existing sources and minimizing future increases in salt load caused by human activities.

The plan of implementation is composed of many actions contemplated by the federal government (and cost shared by the Basin states) and many of its agencies, and by each of the seven Basin states and many of their agencies. For this Review, the plan of implementation can be briefly summarized as follows:

1. Completion of Reclamation, BLM, and USDA salinity control measures to the extent that the measures remain viable and appropriately cost effective with the acceleration of the Reclamation and the USDA efforts by the Basin states' cost sharing).
2. Implementation of the following Forum recommended and adopted policies (text included in Appendix B of this Review).

Imposition of effluent limitations, principally under the National Pollutant Discharge Elimination System (NPDES) permit program provided for in Section 402 of the Clean Water Act of 1977, on industrial and municipal discharges, based on the Forum's 1977 "Policy for Implementation of Colorado River Salinity Standards Through the NPDES Permit Program;"

"Policy for Use of Brackish and/or Saline Waters for Industrial Purposes;"

"Policy for Implementation of the Colorado River Salinity Standards Through the NPDES Permit Program for Intercepted Ground Water;" and

"Policy for Implementation of the Colorado River Salinity Standards Through the NPDES Permit Program for Fish Hatcheries."

3. Implementation of nonpoint source management plans developed by the states and approved by EPA.

Item 1 of the list above is to be implemented by federal agencies in conjunction with state, local and private participants. The Forum participates with federal agencies in developing the measures to be implemented and cost shares in Reclamation and USDA efforts. The Forum also urges Congress to appropriate the funds needed for implementation, and recommends legislative changes when necessary. Items 2 and 3 above are primarily implemented by each of the Basin states.

Table 4-1
Colorado River Basin Salinity Control Program
Plan of Implementation Summary
(Values in Tons/Year)

AGENCY	MEASURES IN PLACE	POTENTIAL NEW MEASURES	TOTAL
Bureau of Reclamation	421,000	501,000	922,000
U.S. Department of Agriculture	262,000	242,000	504,000
Bureau of Land Management	38,000	13,000	51,000
TOTAL	721,000	756,000	1,477,700

Table 4-1 illustrates that the Program has removed a total of 721,000 tons of salt annually. In order to meet the goal of 1.48 million tons of salinity control through 2015, it will be necessary to fund and implement potential new measures which ensure the removal of an additional 756,000 tons annually. Table 4-1 further illustrates that the Bureau of Reclamation can potentially remove an additional 501,000 tons, USDA an additional 242,000 tons and BLM an additional 13,000 tons. The costs per ton for salt control are estimated to be \$30.00/ton for Reclamation, \$45.00/ton for USDA, and \$30.00/ton for BLM. Based on these costs per ton, in order to achieve this level of salt reduction, the Forum has estimated that the federal departments and agencies will require the following funding commitments: Reclamation - \$17.5 million/year; USDA - \$12.0 million/year; and BLM - \$5.2 million/year. These estimated cost values are

substantiated through salinity control expenditure experience to date and the technical ability to actually implement these efforts through the Salinity Control Program.

Federal Programs

Overview

Major components of this Review's plan of implementation are the federal programs. Table 4-1 summarizes the salinity control achieved by the federal participants under the original and current authorities and the salinity control measures which must be implemented in order to meet the goal of approximately 1.48 million tons of salt load reduction annually through 2015.

The involved federal agencies, working in close cooperation with the Forum, have identified salinity control measures that have been and may be implemented. The collective efforts of Reclamation, the USDA, and the BLM are identified and summarized in Table 4-2.

It should be recognized that over time some of the salinity control measures now in the plan of implementation might not remove all of the projected salt, and the costs of removal may increase. Other salinity control measures would then be implemented to maintain the numeric criteria while the Basin states continue to develop their compact-apportioned waters.

The following sections briefly describe Reclamation's, USDA's, BLM's and EPA's activities which constitute the federal portion of the recommended plan of implementation.

Reclamation/USDA Units

Since the original salinity control act passed in the 1970's, Reclamation's and USDA's participation in the plan of implementation has changed in several ways. Both programs were restructured in 1995-96 with changes to their authorizations. Reclamation's program now encourages open competition for all types of salinity control. The USDA salinity control program was incorporated into a larger, national program (Environmental Quality Incentives Program (EQIP)) with multiple purposes.

Although Reclamation projects may address any type of effective salinity control, many Reclamation projects concentrate on improving the efficiency of irrigation delivery systems, while the USDA program concentrates on improving on-farm systems. The two programs have purposely been designed to be highly integrated. This has improved the overall performance of the combined program beyond what either agency might have done individually.

**Table 4-2
Summary of Federal Salinity Control Programs**

UNIT	TONS/YR REMOVED
MEASURES IN PLACE BY USBR	
USBR Basinwide Accomplishments thru	49,600
Meeker Dome (USBR)	48,000
Las Vegas Wash Pittman (USBR)	3,800
Grand Valley (USBR)	127,500
Paradox Valley (USBR)	128,000
Lower Gunnison Winter Water (USBR)	41,400
Dolores (USBR)	23,000
SUBTOTAL	421,300
MEASURES IN PLACE BY USDA	
Grand Valley (USDA)	77,800
Uinta Basin (USDA)	92,300
Big Sandy River (USDA)	31,100
Lower Gunnison (USDA)	46,600
McElmo Creek (USDA)	14,300
SUBTOTAL	262,100
MEASURES IN PLACE BY BLM	
Nonpoint Sources (BLM)	28,400
Well-Plugging (BLM)	9,600
SUBTOTAL	38,000
TOTAL	721,400
POTENTIAL NEW MEASURES	
USBR Basinwide (ongoing awards) ¹	335,300
USBR Basinwide (unidentified)	68,100
Price San Rafael (USDA) ¹	87,600
Grand Valley (USDA)	54,200
Uinta Basin (USDA)	14,500
Big Sandy River (USDA)	21,800
Lower Gunnison (USDA)	119,400
McElmo Creek (USDA)	31,700
New Well Plugging and Nonpoint Source (BLM)	23,000
SUBTOTAL	755,600
TOTAL	1,477,000

¹ USDA and USBR benefits are based on a prorated share of the Price San Rafael Project.

The following paragraphs briefly describe the Reclamation and USDA units included in the recommended plan of implementation. Detailed information on each unit can be found in the following reports:

Quality of Water - Colorado River Basin, Progress Report No. 19, January 1999, U.S. Department of the Interior, U.S. Bureau of Reclamation.

Monitoring and Evaluation Report - for each of the salinity control units currently being implemented by the USDA Colorado River Salinity Control Program.

Five Reclamation units (Meeker Dome, Las Vegas Wash, Grand Valley, Paradox and Dolores/McElmo) are all essentially completed. These units are preventing 375,500 tons of salt per year from reaching the Colorado River.

Paradox Valley (Reclamation): Local ground water comes into contact with the top of a natural salt formation where it becomes nearly saturated with sodium chloride and surfaces in the Dolores River channel in Paradox Valley, Colorado. The river picks up over 205,000 tons of salt annually from this saline ground water source as it passes through the valley.

The salinity control program involves pumping the saline ground water, thereby lowering the water table and reducing saline inflows to the Dolores River. The pumped brine is injected into a deep well in the Paradox Valley. About 128,000 tons of salt are being removed annually by this unit. There is the potential to increase this to 180,000 tons/year if sulfates can be removed from the brine prior to injection. The injection well, the brine pipeline, the surface treatment building, and the injection building have been completed and tested. The facility went into operation in Fiscal Year (FY) 1997.

Grand Valley (Reclamation and USDA): The area within the Grand Valley Unit in western Mesa County, Colorado, contributes 580,000 tons of salt annually to the Colorado River. Most of the salts are leached from the soil and underlying Mancos Formation by ground water that is recharged by deep percolation from canal and lateral leakage and on-farm application.

The Reclamation program in the Grand Valley Unit was implemented in two stages. Stage I, encompassing about 10 percent of the unit area, consisted of concrete lining 6.8 miles of the Government Highline Canal (GHC), consolidating 34 miles of open laterals into 29 miles of pipe laterals and installing an automated moss and debris removal structure. This work was completed in April 1983 to test and demonstrate the viability of the project. Stage II construction began on the GHC system in the fall of 1986. Construction of the Price and Stubb Ditch systems started in 1991 under cooperative agreements with the Palisade Irrigation District and the Mesa County Irrigation District. Work on the Stage II systems was completed in 1998. The Unit is expected to reduce salt loading by 131,300 tons/year.

USDA published its plan for the Grand Valley on-farm program in 1977, and in 1980 prepared a supplement to include improvements to lateral systems. The plan, updated in 1994, identified a salt load

reduction goal of 132,000 tons. The USDA program includes the installation of on-farm salinity reduction practices and lining or piping certain off-farm lateral systems which are needed to support the on-farm improvements. Implementation was initiated in 1979 under existing USDA authorities, and in 1987 funding became available under the USDA Colorado River Salinity Control Program and is continuing under the Environmental Quality Incentives Program (EQIP).

Uinta Basin (Reclamation and USDA): The area covered by the Uinta Basin Unit in northeastern Utah contributes about 450,000 tons of salt annually to the Colorado River. Return flows from 204,000 acres of irrigated land account for most of the salt contribution. Projects in this area may apply under Reclamation's new Basinwide Program. Several proposals are under consideration at this time.

USDA published the Uinta Basin Salinity plan in 1970 and in 1987 prepared a supplement to include lateral systems. In 1991, the Uinta Basin Unit was expanded to include treatment on adjacent irrigated land. The plan identifies a salt load reduction goal of 106,800 tons. The USDA program includes the installation of on-farm salinity reduction practices and lining or piping lateral systems. The major emphasis is conversion of inefficient surface irrigation to sprinkler systems. Implementation was initiated in 1980 under existing USDA authorities and in 1987 funding became available from the Colorado River salinity control program and is continuing under EQIP.

Lower Gunnison Basin (Reclamation and USDA): The Lower Gunnison Basin Unit is located in west-central Colorado. An estimated 360,000 tons of salt are contributed annually to the Colorado River. Public Law 98-569 authorized portions of the unit for construction by Reclamation. Construction of the winter water portion of the unit is designed to eliminate ditch seepage during the non-irrigation season by providing a piped delivery system for livestock water. This component was completed in 1996 and is estimated to reduce salt loading by 41,380 tons/year. Studies on ways to reduce costs of the canal and lateral lining portion of the project have been completed. These measures would reduce salt loading by an additional 64,000 tons/year and may apply for funding under Reclamation's new Basinwide Program.

The Lower Gunnison Basin USDA plan, updated in 1994, identifies a salt load reduction goal of 166,000 tons. The USDA program includes the application of on-farm salinity reduction practices and improving off-farm irrigation laterals. Implementation was initiated in 1988 and is continuing under EQIP.

Big Sandy River (USDA): The Big Sandy River Unit is located in southwestern Wyoming. Below Big Sandy Reservoir, water is diverted to irrigate lands in the Eden Project. Irrigation seepage into shallow aquifers near the Big Sandy River is the source of saline seeps. These seeps and springs below the Eden Project contribute about 116,000 tons of salt, and tributaries contribute about 48,000 tons of salt annually to the Green River.

The USDA Big Sandy River Unit plan was published in 1988. The USDA salinity control program consists of converting 15,700 acres of on-farm surface irrigation to low-pressure sprinkler systems. When

fully implemented, the on-farm program will reduce the salt loading by an estimated 52,900 tons/year. Implementation is continuing under EQIP.

Dolores Project/McElmo Creek (Reclamation and USDA): Irrigation and other nonpoint sources in the McElmo Creek area of southwestern Colorado result in an estimated salt load of 119,000 tons/year to the Colorado River.

Salinity control, as an added feature of the Dolores Project, already under construction by Reclamation in 1984, was authorized by the 1984 Salinity Control Act. Reclamation modified the design of Towaoc Canal to allow abandonment and consolidation of certain ditches, and has lined other ditches and installed piped laterals and has reduced salt loading from ditch seepage. These improvements, completed in 1996, will reduce salt loading by an estimated 23,000 tons/year.

The McElmo Creek Unit plan was described in the Natural Resources Conservation Service's (NRCS) 1989 Environmental Impact Statement. The plan, updated in 1994, will remove an estimated 46,000 tons/year of salt from the Colorado River. Implementation of the plan is continuing under EQIP.

San Juan River-Hammond (Reclamation and USDA): The San Juan River Unit drainage contributes approximately one million tons of salt annually to the Colorado River Basin. In the Hammond area, Reclamation has completed a planning report/EA and begun implementation. The project will line sections of the Hammond Project Irrigation system. The estimated salt load reduction would be about 48,000 tons/year. The project is scheduled for completion in 2001.

The NRCS completed an investigation in 1992 to explore the potential for a USDA program in the San Juan River Basin in the Hammond area. Investigations indicated that a USDA on-farm program is not cost-effective in this area.

Price-San Rafael Rivers (Reclamation and USDA): An estimated 430,000 tons of salt annually reaches the Colorado River from these two river basins. The Price and San Rafael Rivers, tributaries of the Green River, are 120 miles southeast of Salt Lake City. The final planning report/EIS was completed and issued in December 1993. The preferred plan would reduce salt loading to the Colorado River by an estimated 161,000 tons/year. Portions of the project are under construction with funding from USDA's EQIP and from Reclamation's new Basinwide Program (Public Law 104-20 which, in 1995, authorized the competitive "Request for Proposal" process).

USBR Basinwide Program: The Act, amended in 1995 (PL 104-20), authorized the Secretary to undertake a variety of salinity control measures without returning to Congress for individual construction authorizations, and to implement salinity control measures by funding state, local, or private-sector initiatives which achieve salinity reduction. It also authorized an additional \$75 Million to carry out the Title II Salinity Control Program.

Reclamation set up a procedure for soliciting proposals for salinity control efforts from the private and public sectors. On three separate occasions, Reclamation formally asked for proposals and received responses to the Requests for Proposals (RFP). In each case, a ranking committee, made up of state and federal representatives, convened. The ranking committee recommended to Reclamation that awards be given to the most promising proposals that offered the best cost effective salinity control.

From the first two RFP's, 18 proposals were received and seven were recommended for approval. Reclamation subsequently entered into seven contracts for a total expenditure of \$40 Million. The cost of this new, competitive approach to salinity control is about \$30 per ton, as shown in Table 4-3, which is nearly a three-fold reduction compared to Reclamation's old program at approximately \$80 per ton. The projects moving ahead from these first two RFP's are Wellington, Ferron, Castle Valley, Duchesne canal linings and Ashley Sewage Lagoon in Utah; the Hammond Project in New Mexico; and a saline well plugging project with the Navajo Nation.

Table 4-3 Reclamation Basinwide Salinity Control Project Summary

Unit/Study	RFP Date	Implementation	Controls (tons/yr)	USDA Capital Cost	Reclamation Capital Cost	Reclamation Obligations as of 5/99	Annual O&M Costs	Cost per Ton
Hammond	1996	1996-2001	48,130	\$0	\$13,486,000	\$5,001,000	\$0	\$23
Navajo Well Plugging	1996	1998-1999	500	\$0	\$71,000	\$0	\$0	\$12
Cottonwood	1996	1998-1999	8,506	\$0	\$2,100,000	\$1,955,680	\$0	\$20
Wellington	1996	1998-2002	14,532	\$0	\$3,935,400	\$3,935,000	\$0	\$22
Ashley	1997	1999-2000	9,000	\$0	\$3,269,000	\$3,269,000	\$0	\$30
Duchesne County	1997	1999-2004	20,417	\$0	\$9,127,000	\$175,000	\$0	\$36
Ferron	1998	1998-2002	47,407	\$4,109,028	\$10,802,744	\$3,408,707	\$0	\$26
Paradox Nanofiltration	1998	1999-2002	81,500	\$0	\$10,264,236	\$1,799,723	\$1,164,643	\$25
Allen Lateral	1998	1999-2000	8,125	\$601,000	\$2,412,000	\$400,000	\$0	\$30
Uncompahgre Demo	1998	1998-1999	2,295	\$0	\$889,600	\$889,600	\$0	\$32
Price (addition)	1998	1999-2001	16,153	\$1,009,400	\$5,182,650	\$0	\$0	\$31
L. Brush Cr.(Sunshine)	1998	1999	2,764	\$185,000	\$858,000	\$858,000	\$0	\$31
North Carbon	1998	1999-2000	10,245	\$416,270	\$3,499,908	\$500,000	\$0	\$31
Moffat	1998	2000	5,112	\$750,000	\$1,066,440	\$0	\$0	\$29
Highline	1998	2000	8,870	\$1,700,000	\$2,100,000	\$0	\$0	\$35
BIA - Ute Tribe	1998	2000	53,344	\$0	\$19,788,373	\$0	\$0	\$30
Price R. Improvement	1998	pending	<u>48,003</u>	<u>\$0</u>	<u>\$0</u>	<u>\$0</u>	<u>\$1,300,000</u>	<u>\$27</u>
			384,903	\$8,770,698	\$88,852,351	\$22,191,710	\$2,464,643	\$27

Note: Basinwide projects which include USDA costs also include on-farm benefits which are shown separately in Table 4-2. USDA and Reclamation capital costs include Basin States cost sharing.

In the early summer of 1998, a ranking committee recommended that from the proposals received from the third RFP, \$50 Million worth of new projects be contracted. Reclamation is now negotiating with these proposers. These new projects are primarily for the improvement of irrigation efficiencies in Utah and Colorado.

The dollar awards include the Basin states' cost sharing. The legislation authorizing the basinwide program initially limits the spending for these efforts to \$75 Million of federal funds. With the state cost

sharing, the spending limit totals \$107 Million. The contracts signed and the efforts under negotiation total \$98 Million. It is possible not all components of each authorized effort and not all proposed efforts yet to be contracted for will be built. Any funds not used as anticipated can be added to the \$9 Million to fund not yet identified measures to be offered in future RFP's.

Under potential new measures, Table 4-2 includes unidentified efforts to control 68,100 tons per year that will need to be implemented before 2015 under the Basinwide Program. Additional salt loading would be controlled in the Price San Rafael area in the joint effort with USDA through contracts with water users who have yet to be identified. It is apparent that the \$9 Million remaining cannot provide for this amount of salinity control. Hence, the plan of implementation must rely on Congress authorizing an increase in the appropriation ceiling.

Bureau of Land Management

The Bureau of Land Management (BLM) component of the plan of implementation includes managing both point and nonpoint sources of salt contribution from public lands in the Colorado River Basin. The majority of salt derived from public lands is of nonpoint source origin. The greatest reductions in salt loading are therefore achieved through normal management practices which minimize soil disturbances, repair disturbed surface environments, and protect water quality. However, due to the nature of such nonpoint sources, the imprecise boundaries encompassed by many management decisions, and the large areas affected, it is difficult to quantify actual impacts on salinity with precision. In contrast, the calculation of salt reduction and/or retention from point source control is relatively easy.

The following paragraphs briefly describe BLM's activities included in the plan of implementation.

Point Source Control: Well plugging represents one of the few opportunities for BLM to eliminate salt from point sources. Occasionally, old or improperly abandoned wells deteriorate and discharge flowing saline waters to the surface. Where the operator is not known or no longer exists, these wells are referred to as orphan wells. Stopping the discharge of large volumes of saline water from these old, improperly abandoned wells has reduced the contribution of salt from these point sources by approximately 9,600 tons/year.

Nonpoint Source Control: Most of the salinity reduction achieved by BLM originates from nonpoint sources. Actions tend to fit under one of the following aspects of resource management, within which there is some unavoidable overlap: planning and administrative decisions, vegetative management, wild horse and burro management, construction and maintenance, or use authorizations. Actions taken by BLM to reduce salt contributions from nonpoint sources currently prevent approximately 28,600 tons of salt per year from reaching the Colorado River.

Planning and Administrative Actions: These are broad, general management actions which establish a foundation or framework for future decisions. They include planning documents of all types, studies, inventories, and other commitments to information collection, or science-based decision-making. Although impacts on salinity are often not a direct consideration during the formulation of these actions, salinity retention is often a peripheral benefit that is realized as the strategies are implemented.

Vegetative Management: Actions taken to improve vegetative cover result in slower runoff velocities, decreased runoff, and decreased soil erosion. Decreasing the amount of runoff and soil erosion on upland areas results in a decrease in the potential amount of salt reaching the Colorado River. Vegetative management actions include: riparian area improvements, noxious weed control, reclamation/revegetation, and prescribed burns.

Wild Horse and Burro Management: Wild horse and burro herds can put additional pressure on fragile soils and riparian areas by disrupting soils and plants through their physical movements and by the removal of ground cover through grazing. BLM can reduce such damage only by thinning the herds, by influencing their movements, or by protecting fragile or vulnerable areas from exposure.

Construction and Maintenance Activities: Construction and maintenance activities are concerned with engineering and construction of facilities which are primarily designed to decrease or intercept runoff and soil erosion, and thereby limit the offsite movement of saline water and sediment. Once these facilities are constructed, they require periodic maintenance in order to keep them working efficiently. Construction and maintenance activities include: road and trail maintenance and closures, protective fencing and access control, development of springs and water sources to improve livestock distribution, erosion control structures, and sediment retention structures.

Use Authorizations: Use authorizations must be issued before certain land-use activities can take place on public lands. Where saline soils are present, these use authorizations contain stipulations designed to minimize off-site movement of saline water and soil. Some important uses that occur in saline areas and require authorizations are: oil and gas development, grazing, and off-road vehicle use.

Environmental Protection Agency

NPDES permits are issued by EPA for the two non-delegated states in the Basin (Arizona and New Mexico) and for all Indian tribes. In Arizona, the state drafts the permits for Arizona waters consistent with the Forum's NPDES policies. The state also provides the public notices. EPA Region IX issues the state-drafted Arizona permits and drafts and issues permits for tribal waters consistent with the Forum's policies. EPA Region IX issues permits for Navajo lands in all three EPA regions. EPA Region VI drafts and issues permits for Tribal and state waters in the New Mexico portion of the Basin consistent with Forum policies. EPA Region VIII issues the NPDES permits for Indian facilities in Region VIII's portion of the Colorado River Basin, and all federal facilities within the State of Colorado. Salinity

requirements for these permits are reviewed and added where needed during the permit re-issuance process.

EPA's responsibility in administering NPDES permits, particularly on Indian Reservations, to three regions of EPA potentially provides an opportunity for inconsistency and perhaps neglect in the administration of these NPDES permits. In updating permit data for the Review, the Forum experienced difficulty in obtaining current permit information from EPA. In order to properly carry out the plan of implementation, this deficiency needs to be corrected, by EPA providing updated permit information to the state water quality agencies on a periodic basis.

State Programs

Overview

A major addition to the state programs that has occurred since the 1996 Review is the authority for the Basin states to cost-share in the Reclamation and the USDA programs. This allows, in the last three years and in the future, for additional funds to be made available from the Basin states' funds through up-front cost sharing to move the salinity control effort ahead. In the past, use of the Basin states' funds had been limited to repaying the states' share of the federal expenditures.

The states' portion of the plan of implementation, as set forth in this and earlier Forum Reviews, also includes both effluent limitations on industrial point source discharges, with the objective of no-salt return whenever practicable, as well as a program which parallels USBR and USDA efforts and which is funded from the Basin states' funds.

Basin States' Cost Sharing Programs

Public Law 93-320 (Salinity Control Act) provided for the use of Basin states' funds, monies made available from an upward rate adjustment or surcharge on energy sales to the users of certain Colorado River hydroelectric energy. More specifically, the funds are provided from the Upper Colorado River Basin Fund and the Lower Colorado River Basin Development Fund. The Basin states' funds, under the original program authorized by the Salinity Control Act, were used by the Basin states to reimburse the federal government for a portion of the costs for salinity control activities of the USBR and the USDA. Public Law 104-127 (FAIRA) modified the Salinity Control Act and provided that these funds can be used for up-front cost sharing in the amount of 30 percent of the federal funding for the salinity control program. Hence, the Basin states can provide a 30 percent up-front cost-share for the USBR Basinwide Program authorized under Public Law 104-20 and the USDA salinity control program being funded under EQIP. Because the 30 percent value represents the cost-share percentage associated with the federal costs, the up-front cost-share from the Basin states' funds has the effect of increasing the total federal/states funding

by 43 percent. Thus, for every federal dollar appropriated, a total of \$1.43 is expended on salinity control activities through the up-front cost sharing.

Under USBR’s Basinwide Program, the Forum’s Parallel Program dollars are combined with the federal appropriation to simply stretch the total program an additional 43 percent. In the past three fiscal years, the Basin funds have increased the USBR efforts by \$3,900,000 (see Table 4-4). The USBR Basinwide Program receives additional cost sharing when a proponent for proposed efforts adds its funds to make its proposal cost-effective as it competes with other proposals.

With respect to the USDA program, the Basin states, in conjunction with the USDA and the USBR, administer a separate on-farm program in parallel (State Parallel Program) with the EQIP program. Under this process, the USDA presents to the Forum recommended on-farm salinity activities to be funded under the State Parallel Program. These monies are distributed by contract by the USBR to state agencies for the on-farm cost sharing portion of the program. Additional State Parallel Program funds are distributed by contract by the USBR to the NRCS State Conservationists to provide for technical assistance, monitoring and education. During the triennial review period, of the total Parallel Program dollars spent by the Basin states, 60 percent was spent for on-farm cost sharing and 40 percent was spent for technical assistance, monitoring and education.

The funds provided to the USDA program, as stated above, have been obligated by six contracts each year. Over the last two fiscal years, \$2,576,000 funds have been allocated from the Basin states’ funds and the allocation is set forth in Table 4-4.

Table 4-4
State Parallel Program
Cost Sharing for the USBR Basinwide Program and the USDA EQIP Program

	1996	1997	1998
Wyoming Farm Assistance		\$50,700	\$102,857
Wyoming Technical Assistance		\$21,729	\$68,572
Utah Farm Assistance		\$390,000	\$239,143
Utah Technical Assistance		\$167,143	\$159,428
Colorado Farm Assistance		\$480,000	\$414,428
Colorado Technical Assistance		\$205,714	\$276,286
USDA Subtotal		\$1,315,286	\$1,260,714
USBR Basinwide	\$150,000	\$1,500,000	\$2,250,000
TOTAL	\$150,000	\$2,815,286	\$3,510,714

Forum's NPDES Policies

In 1977, the Forum adopted its "Policy for Implementation of Colorado River Salinity Standards Through the National Pollution Discharge Elimination System (NPDES) Permit Program." This policy provides guidance for the regulation of municipal and industrial point source discharges of saline water. In 1980, the Forum adopted a policy to encourage the use of brackish and/or saline waters for industrial purposes where it is environmentally sound, and economically feasible. A third policy dealing with intercepted ground water was adopted by the Forum in 1982. In 1988, the Forum adopted a fourth policy which addresses the salinity of water discharges from fish hatcheries.

Important components of the plan of implementation for salinity control are the Basin states' activities associated with the control of total dissolved solids through the National Pollutant Discharge Elimination System (NPDES) Permit program, and the water quality management plans. Each of the states has adopted the Forum policies presented in Appendix B. A listing of the NPDES permits in force within the Colorado River Basin are presented in Appendix C. During the period of this review, the status of implementation of the NPDES permits and the water quality management plans in each of the states is as follows:

Arizona

NPDES Permits: The Arizona Department of Environmental Quality (ADEQ) does not have primacy over the NPDES program, which is still administered by EPA, Region IX. The annual permitting workload is shared equally by both agencies; each drafts permits, prepares and publishes public notices and responds to comments. EPA works with the Navajo EPA in drafting permits on the Navajo Indian Reservation. Final draft permits, written by ADEQ, are then forwarded to EPA for approval and issuance. Both the State, EPA and Navajo EPA follow Forum policy in the administration of the NPDES program.

Currently, there are 50 permits in the Colorado River Basin portion of the state: 42 municipal or domestic facilities (six are major facilities) and eight industrial facilities (two are major facilities). Thirty-six of the fifty permits discharge to ephemeral tributaries which are many miles from the mainstem of the Colorado River. All new and renewed permits contain language requiring permittees to adhere to Forum policy regarding salt discharges.

Water Quality Management Planning: The Northern Arizona Council of Governments (NACOG) is the designated planning agency (DPA) for the Colorado River and its tributaries in the northeast and north-central parts of the state. The Western Arizona Council of Governments (WACOG) had similar responsibilities for Mohave, LaPaz and Yuma Counties until they de-designated from the program in 1993. La Paz County became the DPA for its area in 1996, and ADEQ currently functions as the DPA for Mohave and Yuma Counties.

NACOG's Water Quality Management (208) Plan, last updated in 1993, encourages local control and the voluntary use of Best Management Practices (BMPs) to reduce nonpoint source pollution from

silviculture, agricultural activities and urbanization. La Paz County developed a Water Quality Management Plan for its jurisdiction when it requested DPA status.

Other Activities: Pursuant to Section 319 of the Clean Water Act, Arizona has developed and implemented a State Nonpoint Source Assessment and Management Program. Section 319 required each state to prepare an assessment of its nonpoint source impacted waters and develop a management plan for controlling pollution from these activities. Arizona's program has been in place over 10 years and steady progress is being made in identifying, controlling, and abating nonpoint source pollution from silviculture, road construction and maintenance, agricultural and grazing activities, mining, and urban development. As part of the NPS Plan, ADEQ has identified and entered into agreements with other state and federal land management agencies to carry out portions of the nonpoint source program. These agencies include: U.S. Forest Service, Arizona Department of Transportation, National Park Service, State Parks Department, Bureau of Land Management, State Land Department, individual municipalities, and tribal entities.

Section 319 also provides federal grants for demonstration projects which are reviewed by ADEQ for consistency with State goals to ensure proposals contribute to improved water quality management. Categories of projects and programs related to salinity control include irrigation systems, well plugging, salinity control impoundments, diversion structures, and rangeland management.

California

NPDES Permits: The California Regional Water Quality Control Board, Colorado River Basin Region (Regional Board), issues the NPDES permits for navigable waters and Waste Discharge Requirements for land discharges within the Colorado River drainage portion of the state. In issuing and reissuing waste discharge requirements, the Regional Board complies with all Forum policies. In addition, the Regional Board has included in the discharge permit requirements for land discharges, a prohibition against brine backwash from water softeners into evapo-percolation ponds which overlie ground waters which are in hydraulic continuity with the Colorado River System. Industrial discharges are to be confined in impervious evaporation basins.

Water Quality Management Planning: The Water Quality Control Plan for the Colorado River Basin was adopted by the Regional Board in November 1993. Following public hearings, the updated plan was adopted by the Regional Board and approved by the State Water Resources Control Board in February 1994. The revised plan became effective upon approval of the Office of Administrative Law in August 1994. The salinity control component of the Water Quality Control Plan is consistent with the Forum's plan of implementation for salinity control. The Regional Board is working with local entities and the Colorado River Board of California to ensure that implementation of the water quality plan is achieved.

In November 1998, the Regional Board indicated that it would begin reviewing the Water Quality Control Plan for the Colorado River Basin to determine whether the Basin Plan should be updated or amended. The Forum is unable to predict when the Regional Board will complete this process.

Other Activities: State Water Resources Control Board policy 75-58 established priorities for the use of poor quality waters for cooling of inland power plants, and has been in effect since 1975. The State Water Resources Control Board has included salinity control in the Colorado River among its top priority items.

Colorado

NPDES Permits: The NPDES permit program was delegated to the State of Colorado by the EPA in May, 1978. The Water Quality Control Division ("WQCD") of the Colorado Department of Public Health and Environment administers the NPDES program in Colorado. The Water Quality Control Commission ("WQCC") has adopted regulations for implementation of the Colorado River Salinity Standards which reflect the four Forum policies adopted to date. Permits issued for discharges tributary to the Colorado River require compliance with these regulations and monitoring of discharge salt load. Consistent with the Forum's policies, industrial and municipal permittees who cannot meet the no salt discharge objective of those policies, and do not otherwise qualify for a waiver of the no salt objective, are required to conduct studies to demonstrate that meeting these standards is not practicable.

Currently (as of September 30, 1998), there are 210 NPDES permits in the Colorado River Basin portion of the state, of which 123 are domestic or municipal and 87 are industrial facilities. Of this total, there are 3 major industrial permits and 20 major municipal permits.

Water Quality Management Planning: Pursuant to Section 319 of the Clean Water Act ("CWA", as amended) Colorado developed a "Nonpoint Source Assessment Report" ("NSAR") which identified stream segments impacted by nonpoint source pollution and categories of nonpoint source pollutants which added significant pollution to those stream segments. The report recognized the impacts caused by salinity from nonpoint sources on several stream segments and principally attributed the elevated salinity levels in those segments to agricultural activities (i.e. irrigation and soil erosion due to grazing). It further recognized the significance of the salinity control efforts which have been made pursuant to the Colorado River Basin Salinity Control Act. The assessment report also recognized the need for development of best management practices (BMPs) to control nonpoint source pollution, and a handbook of BMPs has been completed. This information is currently being updated, and is now included in the biennial Section 305(b) (of the CWA) report, "Status of Water Quality in Colorado".

The "Colorado Nonpoint Source Management Program", completed by the State and approved by EPA, is intended to provide an implementation strategy for the future treatment of water quality problems identified in the NSAR. The program sets forth the roles and responsibilities of the various parties responsible for implementing the nonpoint source program in Colorado. The program includes: a priority system for reviewing, ranking and recommending nonpoint source control projects for funding and BMP's

that can be utilized to achieve water quality objectives. The program is currently being updated and will also include EPA's "9-Key Elements".

In the Colorado River Basin of Colorado there are four water quality planning regions. Region 9 covers primarily the San Juan Basin portion of Colorado. Salinity control projects in this area include McElmo Creek and portions of the Dolores Project. The Region 10 plan covers primarily the Gunnison and Dolores River Basins. Salinity control projects in this region include the Lower Gunnison and Paradox Valley units. Region 11 includes the Colorado main stem below Dotsero, and the lower reaches of the White and Yampa Rivers. Salinity control projects in this region are Grand Valley, Glenwood-Dotsero and Meeker Dome. Region 12 is comprised primarily of the high mountain headwaters of the Colorado River and produces little salt loading to the river system. The Water Quality Management Plan for this region has not been updated recently. Regional plans direct salinity control efforts towards control of point sources and local control of nonpoint sources in the form of urban runoff restrictions and contain lists of stream classifications and the NPDES permits within each area.

Opportunities for salinity control have been identified in the management plans for all areas of the Colorado River Basin within Colorado. Critical salt yielding areas have been assessed by the USDA, the Colorado Soil Conservation Board, the local soil conservation districts, and in some cases the US Bureau of Land Management. Most recently the USDA's Natural Resources Conservation Service and the WQCD's staff cooperated in preparing a Unified Watershed Assessment which identified watersheds to be targeted for water quality improvement projects. All of the high salinity load contributing watersheds in western Colorado were assigned the highest priority for the use of additional funds made available to the Nonpoint Source Program established by Section 319 of the CWA.

Other Activities: Colorado has continued its support of the basinwide approach to salinity control through its participation in the Colorado River Basin Salinity Control Forum and active promotion of participation in salinity control projects by local water users. The Colorado General Assembly recently authorized a \$1 million loan program administered by the Colorado Water Conservation Board to help finance cost-sharing obligations of local participants.

The Colorado Soil Conservation Board (CSCB), with support from other state agencies, is continuing its work with the NRCS, Farm Service Agency and local soil conservation districts to direct, as appropriate, available federal soil conservation funding programs towards improvement of on-farm irrigation practices. The salinity control benefits of improved practices are one of the reasons for this effort. In 1997 the CSCB agreed to manage a program for the Salinity Control Forum that provides for the cost-sharing required for salinity control provided through the USDA EQIP program.

Selenium, an element essential in small amounts, and yet toxic to aquatic and bird life in slightly larger amounts, is believed to be liberated by the same processes which load salt to the River system. The National Irrigation Water Quality Program ("NIWQP"), an Interior program composed of the USBR, USFWS and USGS has been charged with identifying and reducing selenium loading produced as a result

of the operation of Federal projects. NIWQP will provide 44% of the total costs of a demonstration project, thereby “buying down” the cost of the salinity control features under a proposal submitted by the Uncompaghre Valley Water Users Association and accepted by USBR’s new competitive salinity control program. The project, located in the Montrose Arroyo basin, will place over seven (7) miles of irrigation ditch in pipe, and through extensive monitoring will allow an analysis of how much selenium can be reduced in conjunction with a conventional salinity control project. The Colorado Division of Wildlife is assisting in implementation of the Habitat Restoration Plan which is a required element of the demonstration project. Additionally, the Colorado NPS Council has funded a 319 project to begin a process to target selenium loading in the Gunnison and Uncompaghre Valleys, with the goal of reducing this loading in the future.

Nevada

NPDES Permits: EPA has delegated the Nevada Division of Environmental Protection (NDEP) authority to issue NPDES Permits. The industrial companies located at the Basic Management, Inc. (BMI) complex have eliminated industrial wastewater discharges to the Las Vegas Wash. The companies now pipe wastewater to lined evaporation ponds. Two of the companies have been issued permits which allow discharge of cooling water to Las Vegas Wash with a limit of no more than 75 mg/L TDS greater than the water supply. Another company has been issued a permit which allows discharge of surface stormwater runoff.

In the past, the Nevada Power Company discharged brackish cooling water from both the Clark and Sunrise Power Plants into the Las Vegas Wash. Permits now prohibit such discharges and the Company treats and recycles water for further cooling before final disposition into lined evaporation ponds. The new recycling process has reduced the cooling water requirement by about 75 percent.

The City of Las Vegas (CLV) and the Clark County Sanitation District (CCSD) were issued new discharge permits in January 1992. The City and County permits allow a flow of up to 66 and 90 million gallons per day (MGD), respectively. Permit applications are pending for discharge of 91 MGD for CLV and 110 MGD for CCSD. Changes from the previous permits include Waste Load Allocations (WLA) for total phosphorus and total ammonia, whole effluent toxicity testing, chlorine residual limits, and an ambient monitoring program in Las Vegas Wash and Las Vegas Bay. The WLA for total phosphorus will apply from March through October and ammonia from April through September. The WLA does not apply to other periods of the year.

The City of Henderson was issued an NPDES permit in December 1997 to discharge up to 13 MGD to the Las Vegas Wash. In April 1998, the City submitted a new NPDES application which would allow discharge of up to 30 MGD to the Las Vegas Wash. The permit application is currently under review and is expected to be approved by NDEP in 1999. The existing and proposed NPDES permits recognize that the WLA is based upon each Las Vegas Valley discharger’s proportionate share of flow as approved by NDEP and agreed to by each Las Vegas Valley discharger. Henderson will continue to use its rapid infiltration basins and percolation ponds as a disposal option as currently allowed by NDEP. Additionally, Henderson has an aggressive reclaimed water program which uses reclaimed water on golf courses and roadway medians.

The CCSD makes direct discharge of part of Laughlin's wastewater effluent into the Colorado River, and reuses the remainder on the local golf course. The CCSD estimates that by the year 2000, Laughlin, a rapidly growing resort area located adjacent to the Colorado River, will ultimately have 7,000 acre-feet per year of treated effluent available, of which 2,000 acre-feet per year will be reused, with the remaining 5,000 acre-feet per year being returned to the Colorado River for credit. An NPDES permit has been issued. The quality of the waters affected by this permit will be closely monitored and all necessary programs to protect water quality standards will be implemented.

Nevada is continuing to apply the policies adopted by the Forum.

Water Quality Management Planning: After passage of Senate bill 468 by the Nevada State Legislature in May 1975, area-wide water quality management planning duties and powers were vested to certain counties. The Clark County Board of Commissioners (BCC) was designated the Area-Wide Water Quality Management Planning organization within Clark County. The initial 208 Water Quality Management Plan (208 Plan) was adopted by the BCC in 1978 and was approved by the EPA.

In 1997, the BCC adopted the Las Vegas Valley 208 Water Quality Management Plan Amendment. The Las Vegas Valley 208 amendment included updates to planning area boundaries, wastewater flow projections, reclaimed water demands, nonpoint source management, Las Vegas Wash Wetlands planning, integrated planning coordination, and overall water quality planning.

The main purpose of this 208 Plan Amendment is to:

- C Revise the 1990 208 Plan Amendment
- C Include effects of sustained regional growth and development
- C Revise stormwater permitting to a more inclusive nonpoint section
- C Provide water quality planning to a horizon year of 2020

Updated aspects of the plan include the planning area boundaries, wastewater flow projections, reclaimed water demands, nonpoint source management, Las Vegas Wash Wetlands planning, integrated planning coordination, and overall water quality planning.

Clark County is currently amending the rural county 208 Water Quality Management Plan. The amendment area is located in the northeast area of the county including the communities of Bunkerville, Logandale, Overton, Moapa and Moapa Valley, and the City of Mesquite. Two rivers are located in the area, the Muddy and Virgin Rivers. The Virgin River is currently listed on the State's 303d list. Both rivers have aquatic endangered species and drain into Lake Mead.

On December 17, 1998, the Southern Nevada Strategic Planning Authority (Authority) adopted a strategic plan for southern Nevada. The Authority was created in the 1998 State of Nevada legislative session. The Authority's task is to develop objectives and strategies to address growth related issues such as wastewater and water quality. The plan will be passed on to the 1999 legislative session.

Expansions of the CCSD and CLV wastewater treatment facilities are underway in accordance with approved 201 facilities plans. Industrial pre-treatment permits are being required by the CCSD for reverse osmosis treatment of shallow groundwater and on-site treated gray water to be used by the Mirage/Treasure Island development in its landscaping and decorative water features. This represents a new beneficial use of shallow saline ground water which is pumped for dewatering around building foundations. Local government entities within urban Clark County are also participants in the NPDES Stormwater Quality Management Committee to identify and implement measures to meet State stormwater permitting requirements. Future 208 amendments are expected to address gray water issues and shallow ground water issues, to update population projections, and to incorporate BMPs identified in the stormwater permit for the Las Vegas area entities.

In June 1998, the State Environmental Commission adopted revised water quality standards for the Las Vegas Wash and Lake Mead. The revisions were based on data collected from 1991 through 1996 and include changes to total dissolved solids (TDS) requirements to maintain higher quality (RMHQs). RMHQs are established when the existing water quality is better than the criteria necessary to protect the beneficial uses. For the upper Las Vegas Wash, the TDS RMHQ was lowered from 2,300 mg/l to 1,900 mg/l; and for the lower Las Vegas Wash, the TDS RMHQ was lowered from 2,600 mg/l to 2,400 mg/l. The lower TDS concentrations seen in the Las Vegas Wash in recent years most likely results from dilution of the saline groundwater which discharges to the Wash by the increasing, but relatively low TDS flows discharged from the wastewater treatment plants.

Facilities Plans: The City of Henderson recently completed a Facility Plan which defines various stages of wastewater treatment expansion to address growth and potential changes in regulatory requirements. The existing Water Reclamation Facility was upgraded to 20 MGD in 1998 and will be expanded to 30 MGD by 2002. The Facility will have the capability of discharging to the Las Vegas Wash on a year-round basis. However, the City will continue to encourage the use of reclaimed water and will continue to use the existing rapid infiltration basins as a means of disposal.

The CCSD is constructing a project which will increase the District's advanced secondary treatment capacity to 65.6 MGD. This should be sufficient capacity for projected wastewater flows through the year 2000. The advanced secondary treatment plant will provide nitrification to reduce ammonia to required levels. Effluent from the advanced secondary treatment plant will be pumped to the Advanced Waste Treatment (AWT) plant for additional treatment which includes the removal of phosphorus.

The capacity of the City of Las Vegas' treatment plant is 66 MGD. The treatment plant provides secondary treatment, phosphorus removal, and nitrification to remove ammonia. The treatment facility treats the flows of both the Cities of Las Vegas and North Las Vegas. Permit applications are pending for expansion to 91 MGD.

Other Activities: A program has been developed by CCSD, CLV, and CNLV to coordinate, investigate, and encourage the implementation of management practices resulting in reduction of wastewater

salinity. The principal emphasis of this program will be directed toward salinity control to meet the requirements of the NPDES permits issued to Clark County, the City of Las Vegas, and Henderson.

New Mexico

NPDES Permits: Authority for issuing permits has not been delegated to the state of New Mexico. Currently, the program is being administered by EPA, Region VI, except for facilities located on the Navajo Indian Reservation, which are administered by Region IX. EPA is following Forum policy in the administration of the permit program. All new or renewed discharge permits contain language requiring the permittee to adhere to Forum policy regarding salt discharges.

In the Colorado River Basin within the state, the following permits have been issued:

- a. Industrial permits: electric power generation (3), coal mines (8), uranium mines (3), sand and gravel operations (3), small domestic sewage treatment plants (3), small process water treatment facility (1), and a drinking water treatment plant (1).
- b. Municipal discharge permits: major sewage treatment plants (3) minor sewage treatment plants (2), and federal/Indian wastewater facilities (11).

Water Quality Management Planning: Work elements of the State of New Mexico Water Quality Management Plan (NMWQMP) and the New Mexico Nonpoint Source Management Plan (NPSMP) applicable to the Colorado River Basin are stream bottom deposits and sediment control from many different sources, including hydromodification, silviculture and irrigated agriculture. The New Mexico Water Quality Control Commission is required to approve and adopt the NMWQMP's for New Mexico. The initial Plan was adopted in two parts in October 1978 and May 1979. The most recent update to the NMWQMP was adopted in 1991. The most recent update of the MPSMP was in August 1994, and as required, will be updated during calendar year 1999. Both plans recognize the importance of working cooperatively with the Colorado River Basin Salinity Control Forum.

The NMWQMP and the NPSMP cover the entire state except for that portion of the Navajo Reservation lying therein. Planning within the reservation is the responsibility of the Navajo Tribe. Much of the Colorado River Basin in New Mexico is within the reservation.

Both plans encourage the voluntary use of BMPs to control or reduce nonpoint source pollution. The NMWQMP currently designates the San Juan River Basin in New Mexico as one of the four priority basins for implementation of sediment control. Water quality segments 2405 and 2401 of the San Juan River are both listed on the State's 1998-2000 Section 303(d) list of impaired waters for stream bottom deposits, and for turbidity and fecal coliform respectively. Segments 2403 and 2404 of the Animas River are currently listed on the Section 303(d) list for stream bottom deposits. The San Juan River Basin is

scheduled for an intensive water quality survey and possible Total Maximum Daily Load development by December 31, 2004 under a federal court order Consent decree stemming from the case of Forest Guardians and Southwest Environmental Center v. Carol Browner, Administrator, U.S. Environmental Protection Agency, Civil Action No. 96-0826 LH/LHF. The San Juan Basin and its tributaries are also a Category 1 watershed under the Clean Water Action Plan, Unified Watershed Assessment (UWA). The UWA prioritizes the use of certain 319(h) monies and State Revolving Load Fund monies (SRF) toward the implementation of Nonpoint Source Management Projects in the various priority watersheds.

The NMWQMP includes designated management agencies responsible for implementation of the nonpoint source control programs set forth therein. The agencies designated for portions of New Mexico lying within the Colorado River Basin are:

- C New Mexico Forestry Division for silviculture;
- C New Mexico State Highway Department, New Mexico State Park and Recreation Division, and Jicarilla Apache Tribe for rural road construction and maintenance;
- C New Mexico State Land Office and U.S. Bureau of Land Management for sediment control;
- C U.S. Forest Service for sediment control, rural road construction and maintenance, and silviculture, and;
- C U.S. Bureau of Indian Affairs for sediment control, rural road construction and maintenance, silviculture, and irrigated agriculture.

Additional management strategies used to control nonpoint source pollution were developed by the State under Section 319 of the 1987 Amendment to the federal Clean Water Act. Section 319 required each state to develop an assessment of its nonpoint source impacted waters and a management plan for controlling pollution from these sources (NPSMP). Both the assessment and the management program have been approved by EPA. The goal of the NPSMP is to develop and implement a program which will reduce human-induced pollutants from nonpoint sources entering surface and ground waters. The New Mexico Nonpoint Source Pollution Management Program has been in effect for nine years. The State is making steady progress in identifying, controlling and abating existing nonpoint source pollution problems, and in preventing additional nonpoint source concerns. Several State and federal land management agencies listed in the NMWQMP, such as the U.S. Forest Service, BLM, and the State Land Office, are participating, along with many other federal, State and Local agencies, in nonpoint source activities.

Other Activities: The State of New Mexico, through the Colorado River Basin Salinity Control Advisory Council and the New Mexico Water Quality Control Commission, supports the Colorado River Basin Salinity Control Program, and recently passed a motion in January, 1999, to support projects using State Revolving Loan Funds (Sec. 201 of the Clean Water Act) (SRF) and other funds. State actions include: (1) support of federal legislation including appropriations to implement the program, (2) inclusion of salinity control measures in the Section 208 plans, (3) dissemination of information on salinity sources and control measures to the water users and the public in the Colorado River Basin area of the state, (4)

consultation with industries on potential salinity reduction measures, (5) implementation of Forum policy through existing legal and institutional mechanisms, e.g. NPDES permits, (6) providing matching funds to support the USGS water quality data collection program in the Colorado River Basin portion of the state, and (7) maintaining a continuous water quality planning program whereby new or additional salinity control measures can be addressed. A decrease in funding for item (6) above has caused a reduction in this program since 1986.

Utah

NPDES Permits: The Utah Division of Water Quality administers the discharge permit program. The State has the responsibility for issuance and compliance for all new permits and permit renewal applications received since July 7, 1987.

Forty-five discharge permits are in effect for industrial facilities in the Utah portion of the Colorado River Basin. Most of the permits are for facilities with no discharge, or for discharge of intercepted ground water from mining operations in accordance with Forum policy. Additional storm water permits have been issued for construction activities.

There are 16 active permits for municipal treatment facilities in the Colorado River Basin of Utah.

Water Quality Management Planning: Water quality management plans pursuant to section 208 of the Clean Water Act for the Uinta Basin, Southeastern Utah, and Wayne County certified by the State and approved by the EPA are in place, and portions of these plans have been implemented.

Other Activities: Utah's Nonpoint Source Management Plan was approved by EPA in December 1989. The plan contains Utah's strategy for the control of nonpoint source pollution in the state. A major element in the plan is the need to define rangeland areas in the Colorado River drainage which are yielding sediment and salinity to the system. In a joint effort, the Utah Department of Agriculture, the Utah Department of Health, the Utah Division of Water Resources, Reclamation, BLM, SCS and the USGS completed the task of delineating these areas in 1992. This project identified watershed projects which may be implemented for salinity control on a cost-effective basis. Utah has relied on USDA EQIP (and previously ACP) funds and Reclamation salinity control funding to implement salinity control projects in the Colorado River Basin.

Major new construction of irrigation improvements for salinity control has started in the Price River and San Rafael River Drainages. The principle funding source for the off-farm conveyance and distribution systems of these projects is Reclamation's Basinwide Program. The on-farm projects use EQIP funding along with local cost share. The local cost share for both programs is generally a combination of landowner monies and state program monies. Utah operates a low interest loan program which provides funding for soil and water conservation and water quality improvement practices for farms. Utah has committed a

substantial amount of funding through this program to irrigation improvement projects which provide salinity reduction from on-farm sources. This program operates under the guidance of the Soil Conservation Commission and local soil conservation districts. In addition, low interest loans are available to irrigation companies from the Board of Water Resources for the improvement of irrigation transmission and delivery systems. These improvements increase efficiency and decrease seepage losses, thereby contributing less deep percolation water for salt loading to the Colorado River system.

Wyoming

NPDES Permits: The Wyoming Department of Environmental Quality (DEQ), Water Quality Division, administers the NPDES Program within the boundaries of the State of Wyoming. The Forum's "Policy for Implementation of Colorado River Salinity Standards through the NPDES Permit Program" is used and followed to evaluate industrial and municipal discharges. A total of fifty-four active NPDES permits are associated with facilities in the Wyoming portion of the Colorado River Basin.

There are currently thirty-five active NPDES permits issued to industrial facilities located in the Wyoming portion of the Colorado River Basin. The primary industrial source of salinity in the Green River Basin introduced through a point-source discharge is Pacificorp's Naughton Plant which discharges approximately ten tons of salt per day into a tributary of the Green River. The permit for this facility was issued on the basis that it was not "practicable" to implement the Forum policy of no discharge of salt from industrial sources, following a decision based upon a comparison of the costs of removing salt and downstream benefits associated with eliminating the discharge. The current permit, due to expire on July 31, 2003, requires a benefit/cost analysis to be conducted by July 31, 2001.

Of the remaining industrial discharges, two appear to be exceeding the Forum's policy limitations on TDS discharges. These are FMC Coke Plant, and the Pittsburg & Midway Coal Company's Skull Point Mine. Estimated average daily salt loadings from these facilities are 1.16 and 1.47 tons/day. However, data to support these estimates are incomplete. Therefore, discharges from these facilities will be evaluated in greater detail to determine the accuracy of these estimates, and, if necessary, permits will be modified such that policy compliance is achieved. There are no identified exceedences associated with the remaining industrial facilities. Permits for twelve of the facilities do not currently require TDS monitoring. These permits will be modified to incorporate monitoring necessary to assess compliance with Forum policy as the permits are renewed.

Nineteen permits are associated with domestic wastewater effluents. These permitted facilities serve a population of approximately 44,000. Of this total population, 33,000 are in Rock Springs and Green River. The wastewater treatment plant discharges at Rock Springs and Kemmerer/Diamondville are out of compliance with the policy in that their incremental increases are 450 mg/L and 468 mg/L respectively. The total populations associated with these towns are 20,000 in Rock Springs, and 3,900 in Kemmerer/Diamondville. The average flow volumes contributed to the system are 2.32 and 0.4 MGD

respectively. At the next permit renewal, the DEQ will work with these municipalities to determine the feasibility of reducing TDS in conformance with Forum policies.

Permits for eleven municipal facilities are currently not in compliance with the policy in that the permits do not require monitoring for TDS. At the time of each permit renewal, DEQ will re-assess whether monitoring is necessary to assess compliance with Forum policy. TDS monitoring will be incorporated into the renewed permits if it is determined that there is a reasonable potential to exceed 1 ton/day or 350 tons/year of salt discharge.

Water Quality Management Planning: The Water Quality Management Planning and Nonpoint Source Implementation Programs in Wyoming are under the direction of the Water Quality Division of the Department of Environmental Quality. The Clean Water Report for Southwestern Wyoming addressed water quality in Lincoln, Uinta and Sweetwater Counties. This report was adopted at the local level, certified by the Governor, and conditionally approved by the EPA on October 9, 1980. The Governor's certification recognized a salinity control program for the Green River Basin as a major water quality priority. The State strongly supports the ongoing USDA-initiated salinity control effort on the Big Sandy River Unit.

The Statewide Water Quality Management Plan establishes an institutional framework under which planning and implementation activities can proceed in Wyoming. Implementation of most aspects of the program depends on the availability of funds and the acceptance of responsibilities by the designated management agencies. The Wyoming Statewide Water Quality Management Plan is amended regularly through adoption of the triennial review and its supplemental report.

The Wyoming Department of Environmental Quality, Water Quality Division, reorganized separate point and nonpoint source sections into a single watershed protection program. A strategy is being developed to assess and coordinate voluntary nonpoint source pollution control efforts more closely with point source permitting activities and groundwater protection initiatives. A five-year statewide monitoring plan has been established to assess water quality on a watershed-by-watershed basis. Watersheds in the Little Snake River Basin and most of the Green River Basin were sampled in 1998, and the remainder of the Green River is scheduled for assessment in year 2000.

The Wyoming 303(d) list of waters requiring the development of Total Maximum Daily Load (TMDL) qualification was published and approved by EPA in April, 1998. A total of 17 stream segments in the Colorado River Basin appear on the list. Only two streams in the Colorado River drainage were listed with credible impairments and neither were salinity related. Exceedences of the pH standard were found on the Hams Fork River near Kemmerer, and Haggerty Creek in the Little Snake Basin was listed for impairments associated with past hard rock mining activities. Both are slated for TMDL development in the next few years. The exact source of the pH problem on the Hams Fork has not yet been identified and a metals remediation plan on Haggerty Creek is currently being developed by the DEQ Abandoned Mine Lands Program.

New wasteload allocations were calculated upon renewal of NPDES discharge permits for the wastewater treatment plant discharges in Kemmerer and Mountain View in 1998. A new allocation will be calculated for the Town of Dixon when its NPDES permit is renewed in the year 2000.

The remaining 12 stream segments are waterbodies for which there is data indicating trends away from supporting designated uses. Four of these are located in the Green River Basin, and 8 in the Little Snake. All are listed for problems associated with silt and sediment, and though salinity is not identified as a problem, efforts to control sediment should also have a positive effect on salt loading. These 12 segments have a relatively low priority for TMDL development because of the existence of ongoing nonpoint source control projects associated with each.

In addition to the 303(d) listed streams, 27 other stream segments have been identified as having potential water quality impairments, but there are insufficient data to make a conclusive determination. These streams are all scheduled for further monitoring and assessment, and a final determination should be made on each by the year 2001.

The Wyoming Nonpoint Source Management Plan was initially approved by EPA in September 1989. The Plan calls for a cooperative, voluntary approach in the implementation of BMPs targeted at water quality improvements. As with the Statewide Water Quality Management Plan, implementation hinges upon acceptance of responsibilities by designated management agencies, and upon the availability of funding under Section 319. The State began a revision of the Nonpoint Source Management Plan in 1998 to conform to new EPA guidelines. The revised plan is expected to be completed and adopted prior to the FY 2000 319 grant allocations.

Wyoming began the triennial review of its surface water standards in 1998. A draft set of regulations was published in August 1998 containing major revisions to the standards program. The most important amendments involve changes to the stream classification system, updated numeric toxics criteria, and new antidegradation and mixing zone implementation procedures. Wyoming continues to support the salinity standards established by the Colorado River Basin Salinity Control Forum, and incorporates the Forum's numeric standards and implementation plans into its overall program. There are no changes proposed for salinity measures in the draft regulations.

Other Activities: There continues to be considerable interest in implementing a second U.S. Department of Agriculture salinity control project in the Black's Fork Basin in Wyoming. Landowners within the Bridger Valley Conservation District have closely followed the success of Wyoming's one ongoing salinity control project, the Big Sandy River Unit. A 1991 reconnaissance-level study by the Wyoming State Office of the Natural Resources Conservation Service indicated the considerable potential to significantly reduce salt loading into the Black's Fork, Henry's Fork and Ham's Fork tributaries of the Green River, and estimated the cost-effectiveness of controlling such salt-loading to be more expensive than the Big Sandy Unit, but at a per-ton cost which would be competitive with other salinity control projects now being implemented. The State of Wyoming is supportive of the initiation of a second on-farm salinity control project in Wyoming, and is continuing to look for ways to get a Black's Fork area project started.

CHAPTER 5 - MEANS OF MAKING PLAN OPERATIONAL

Overview

The Forum has as its objective the overall coordination and implementation of projects, and the continuing review of salinity changes and program effectiveness. At least every three years, the Forum considers existing and projected water depletions and salt concentrations and, as needed and feasible, recommends revisions in the schedule for implementing salinity control measures and/or modifications of the numeric criteria. The Review includes examination of both federal and non-federal programs. The Review is transmitted to the EPA and state water resources and pollution control agencies, and is made available to others interested in the Colorado River Basin Salinity Control Program. A key conclusion of this Review was set forth in Chapter 3 wherein the Basin states find that the present numeric criteria are appropriate and no change in them is recommended at this time.

The means of making the plan of implementation operational consists of having coordinated planning for additional salt removal and seeking the necessary appropriations for carrying out those goals. Accomplishment of the Salinity Control Program is dependent upon funding of the efforts included in the plan of implementation. This is dependent upon agency budgetary requests being made, Congressional appropriations being secured, and irrigation modifications and other salt loading reduction practices being put into place and then kept operational. The amount of funds brought to parallel the federal program by the Basin states' cost sharing is dependent on the federal appropriations.

Program Development and Implementation

Several significant legislative changes concerning the Salinity Control Program have occurred since the adoption of the 1996 Review by the Colorado River Basin Salinity Control Forum. These changes have affected both Reclamation and the Department of Agriculture's (USDA) salinity control programs and have given direction to the Bureau of Land Management (BLM). However, the Salinity Control Program is not static; it is dynamic and, hence, the program needs to be constantly evaluated, with changes being identified and implemented, if needed.

The Basinwide Program authorized in 1995 for Reclamation appears to be proceeding in a very timely way to implement cost-effective measures. However, when the legislation was enacted, a \$75 Million ceiling was imposed by the Congress with the thought that the Basinwide Program would be reviewed after a period of time to see if it was as successful as had been anticipated. It was expected that, with a successful review of the newly implemented program, Congress would increase the ceiling authorized for expenditures. The funds that have been committed or are anticipated to be committed in the near-term point to the need for the Congress to act in the near future to raise the ceiling. Hence, legislation should

be introduced and supported so that there will not be a break in the funding provided to Reclamation's Basinwide Program.

USDA's salinity control program, since the passage of FAIRA, has been inadequately funded, and USDA still must demonstrate its ability and willingness to adapt EQIP to the Salinity Control Program and designate an adequate amount of funds from the EQIP funding authority to the Salinity Control Program. If it cannot be demonstrated that the EQIP program can be successfully used by USDA to fulfill its role in the Salinity Control Program, then consideration needs to be given to new legislative authority and new line-item funding by the Congress. It was the FAIRA legislation in 1996 that authorized the Basin states' cost-sharing up-front from the Basin states' funds for both the Reclamation Basinwide Program and USDA's EQIP program. The implementation of this act's cost-sharing provision was perhaps the most significant event with respect to salinity control that occurred since the 1996 Review.

The management philosophy of BLM has not allowed for a direct approach to salinity control by this agency. Identification of an effective plan, as directed by the Congress, has not been forthcoming, according to budget documents. Recent efforts by coordinators within BLM shows some prospect that there will be more attention given to water quality issues, specifically to the Colorado River Basin Salinity Control Program. If BLM is not able to focus on its role in salinity control, then alternative approaches to obtaining the desired collaborative partnership with this federal land management agency will need to be examined.

The USGS streamflow gaging and water quality sampling activities, and the long-standing periods of record at existing stations, are essential to the monitoring and evaluation of salinity control effectiveness. USGS should continue to seek funding under its existing authority for flow gaging and water quality stations in order to provide necessary data for the evaluation of the short-term and long-term effectiveness of the Colorado River Basin Salinity Control Program.

Continuation of the USGS trend to cut funding for its cooperative gaging program will impact the ability to adequately assess the effectiveness of salinity control projects through the loss of data from needed gaging stations.

Education and Public Involvement

Salinity in the Colorado River is a basinwide problem, with implications ranging over the entire 246,000 square mile drainage area. The Basin's immense size highlights the need for effective public education and public involvement programs due to the physical and cultural diversities which exist across the seven states. Implementation of measures to control complex problems such as salinity requires awareness, concern and involvement, along with recognition that a problem many miles away may have direct impacts. The states individually, and together, as the Forum, have and will continue to work with concerned agencies, both state and federal, to increase the public understanding of the salinity problem and its control.

A major thrust of the public education/public involvement effort focuses on educating irrigators as to the sources, impacts and methods of controlling salinity. Improved irrigation practices will reduce the input of salts into the River system. The goal is to encourage desirable changes in water application technology and management practices. The Basin states work within the framework of ongoing efforts by federal, state and local organizations to achieve this goal. Assistance from the Executive Director of the Forum is also provided. The plan formulation phase of Reclamation, USDA, and BLM salinity control efforts provide an excellent opportunity for public education with regard to Colorado River salinity and the means for its control.

Meetings of the Colorado River Basin Salinity Control Forum are open and the public is welcome to attend. All input, whether oral or written, is considered and acted on as appropriate by the Forum. The Forum also provides for public involvement in the water quality standards review process as public meetings are held to receive comments on the salinity standards during each triennial review. As a result of public input, appropriate adjustments to the program are made.

As each of the Basin states proceeds with its own process to review the standards, one or more state-wide public hearings are held. In addition, there is widespread announcement of Forum and state hearings, and copies of the Review and associated state standards are mailed to interested agencies, groups and individuals. Forum members participate with their own state's water quality planning agencies in matters related to salinity and salinity control and will continue to do so as the need arises.

Forum Activities

The Forum meets at least twice a year, or as needed, to discuss the Salinity Control Program, the efforts of the federal agencies and the states, and the need for additional policy and/or action by the Forum. During the last triennial review effort, the Forum met on June 6, 1996 in Breckenridge, Colorado and adopted the preliminary review report for 1996. The Forum then held public meetings during the late summer and, after receiving comments, prepared a supplemental report dated October 1996.

During the current reporting period, the Forum met on October 23, 1996 in Palm Desert, California; May 20, 1997 in Salt Lake City, Utah; October 22, 1997 in Tucson, Arizona; June 17, 1998 in Cheyenne, Wyoming; and October 20, 1998 in Santa Fe, New Mexico. Since the creation of the Forum in November 1973, the Santa Fe meeting was the 59th meeting. The Forum has published a three-volume compilation of all of the minutes of the Forum meetings, one volume from 1973 through 1985, another from 1986 through 1991, and one from 1992 through 1996. The Forum held its 60th meeting on May 27, 1999 in Durango, Colorado, approved this report, and authorized its printing for mailing. It also scheduled public meetings. The Forum plans to make final the adoption of this report at a meeting in the fall of 1999, and perhaps publish a supplemental report.

A Work Group, created by the Forum, holds meetings on a more frequent basis to review technical information which is generated by the federal agencies. Membership on the Work Group is composed of technical representatives from each of the seven Basin states, and the Executive Director of the Forum. Federal agency representatives, however, attend meetings of the Work Group and informally exchange information, ideas and viewpoints. The Work Group coordinates the efforts of the Basin states and reports back to the Forum any actions which the Work Group believes the Forum should consider.

Positions have been taken on many issues, such as the need for appropriation of funds by the Congress for salinity control. Federal agencies have also prepared numerous reports in the three-year period. The Forum has compiled a library of many reports relating to Colorado River salinity. The Work Group and the Forum have had the opportunity to review and comment on these reports in draft form. Notable among the reports done since the last triennial review is a report which is prepared by the Bureau of Reclamation and submitted to Congress every two years. The last of these publications is Quality of Water, Colorado River Basin, Progress Report No. 19, January 1999, U.S. Department of the Interior. In addition, the Forum and the Work Group have, over the last three years, assisted the Colorado River Basin Salinity Control Advisory Council in the preparation of three annual reports.

Financing Salinity Control Activities

By enacting the 1974 Act, Congress recognized the federal role and responsibility for controlling the salinity of the Colorado River, and adopted a cost-sharing formula which provided that 75 percent of the costs of the four originally authorized Department of the Interior salinity control projects under Title II of the Act are non-reimbursable. The remaining 25 percent of the costs are to be repaid from the Upper and Lower Basin funds over a 50-year period without interest. The maximum allocation to the Upper Basin fund is not to exceed 15 percent of the total costs to be repaid from the two funds, with the remainder to be repaid by the Lower Basin fund.

The 1984 amendments to the 1974 Act changed the cost-sharing formula. For the Department of the Interior program, the non-reimbursable portion was reduced to 70 percent, with the remaining 30 percent to come from Upper and Lower Basin funds in the same proportionate share as under the 1974 Act. However, the Upper Basin fund could repay its share over 50 years with interest, and the Lower Basin could reimburse its share of the annual expenditure during the year that costs are incurred.

The USDA salinity control program, as amended in 1996 by FAIRA, requires at least a 25 percent non-federal cost-share for participation. In addition, the legislation allows for the Basin funds to cost-share up to 30 percent. Money is available in the Basin funds for this purpose.

Table 5-1 provides a compilation of the amount of funding provided to Reclamation, USDA, and BLM for the Colorado River Basin Salinity Control Program from Fiscal Year (FY) 1988 to the present.

Funding levels for salinity control activities by BLM continue to be difficult to ascertain due to the fact that the BLM budget does not contain a specific line item for salinity control.

Table 5-1
Summary of Colorado River Basin Salinity Control Program
Funding For the Bureau of Reclamation,
the Department of Agriculture and the Bureau of Land Management
By Federal Fiscal Year Since 1988
(In Dollars)*

Federal Fiscal Year	Bureau of Reclamation	Department of Agriculture	Bureau of Land Management
1988	20,783,000	3,804,000	500,000
1989	16,798,000	5,452,000	500,000
1990	14,185,000	10,341,000	700,000
1991	24,984,000	14,783,000	873,000
1992	34,566,000	14,783,000	873,000
1993	33,817,000	13,783,000	866,000
1994	32,962,000	13,783,000	800,000
1995	12,540,000	4,500,000	800,000
1996	8,205,000	9,561,000	800,000
1997	5,000,000	3,152,000	800,000
1998	7,600,000	3,906,000	800,000
1999	11,500,000	5,132,000	800,000

* Numbers do not include funds provided for the Reclamation and Agriculture programs as up-front cost-sharing from the Basin Funds.

While the USDA program has proven to be a cost-effective component of the Colorado River Basin Salinity Control Program, Administration and Congressional funding support for the program has dramatically declined. Table 5-1 reflects the significant reduction in USDA appropriations between 1994 and 1999. Funding of the USDA program at recent levels jeopardizes the ability of the plan of implementation to be executed in a manner that assures compliance with the numeric criteria.

The 1984 Amendments to the Act (P.L. 98-569) provide that Reclamation is authorized to reimburse the costs of operation and maintenance expenses in excess of those that would have occurred

for the thorough and timely operation and maintenance of the unimproved system. Those amendments also allow the federal government to pay for replacement costs of the facilities and the costs of operation and maintenance of works to replace impacted fish and wildlife values.

The 1995 Amendments to the Act (P.L. 104-20) did not change the cost-sharing and repayment relationships among the states or the federal government, but it did provide additional flexibility to Reclamation if the proposed project has other associated indirect benefits of federal interest, i.e., other water quality or environmental benefits. The cost of this assistance will not be considered a salinity control cost. The 1996 Amendments to the Act (P.L. 104-127) permit up-front cost sharing by the Lower Basin in lieu of repayment over time of federal expenditures.

Revenues accruing to the Lower Basin fund for the Salinity Control Program are derived from a 2½ mill per kilowatt hour levy on California and Nevada purchases of hydro power generation. Revenues accruing to the Upper Basin fund are collected by the Western Area Power Administration. The plan of implementation, as presented earlier in this Review, incorporates a construction schedule which, when completed, will have a total estimated cost of \$661 million. Under this Plan, the required salinity reduction can be made throughout the planning period (2015), which includes efforts to eliminate the shortfall as soon as possible but at least within six years, and monies in the Lower Basin fund will be adequate to up-front cost-share or meet its repayment obligation.

Two potential sources of funding to assist salinity control efforts exist under the Clean Water Act. Through FY 1999, Congressional appropriations for Section 319 nonpoint source control funds are nearly \$190 Million. Section 319 funds are available for implementing state-adopted EPA-approved nonpoint source management programs. The construction grant program has now essentially been replaced by the State Revolving Fund (SRF) program, which provides low interest loans for pollution control projects. Under Section 603(c)(2), the SRF program can be used to fund implementation of Section 319 projects.

Responsibility for Accomplishing Salinity Control Measures

The plan of implementation recognizes that the Forum, participating federal agencies, and the Basin states each have specific responsibilities for furthering the Salinity Control Program. The elements of the plan of implementation are premised on completion of all of the salinity control measures discussed in Chapter 4 of this report. Specifically, the Forum will continue to provide overall coordination, a continuing review of salinity changes, program effectiveness, and the need to make further program changes and improvements. At least every three years, the Forum considers existing depletions and salt concentrations and, when needed and feasible, recommends revisions in the schedule for implementing salinity control measures and/or modifications of the numeric criteria. This review includes both federal and non-federal programs. The review is then transmitted to the EPA and to state water resources and pollution control agencies and made available to others interested in the Salinity Control Program.

Federal agencies must complete planning efforts and seek authorization and funding for salinity control efforts in accordance with Title II of P.L. 93-320, P.L. 98-569, P.L. 104-20, and P.L. 104-127. The Basin states will continue to encourage the agencies to request funding and to lend their support to obtaining needed funding from the Congress.

Interagency Coordination

Combined Efforts

The Colorado River Basin Salinity Control Program is truly a unique program, and it cannot be successful without the cooperation of a multitude of agencies and governments involved at the local, state and federal levels. First, the program is reliant upon the cooperation of landowners in implementing important and cost-effective salinity control measures. Secondly, the program is dependant upon a multitude of agreements between the seven Colorado River Basin states which have always been accomplished by consensus. Lastly, the program depends upon the cooperation of a number of federal agencies for its success. Public Law 93-320, the Colorado River Basin Salinity Control Act, gives to the Secretary of the Interior responsibilities for implementing salinity control policies adopted for the Colorado River and gives to the Secretary of the Interior many other responsibilities through various sections of the Act.

The Act states: “The Secretary (of the Interior), the Administrator of the Environmental Protection Agency, and the Secretary of Agriculture are directed to cooperate and coordinate their activities effectively to carry out the objectives of this title.” The Act further provides that “the Secretary (of the Interior) or the Secretary of Agriculture, as the case may be, shall give preference to those additional units or new self-contained portions of units which reduce salinity of the Colorado River at the least cost per unit of salinity reduction.” It is obvious that the federal implementing agencies, that is, Reclamation, BLM, and USDA, must coordinate and cooperate in order to advance, as required by the Act, a cost-effective Salinity Control Program. The lead in fostering this cooperation has been taken by Reclamation. The future success of the program is dependent upon this coordination and cooperation, and the Forum finds that the federal agencies need to be more pro-active in ensuring that their efforts are well understood by all of the involved federal agencies and that the programs being implemented are coordinated to the extent possible.

In addition to the three implementing agencies, there are other federal agencies which are involved in the Salinity Control Program, and cooperation and coordination with these agencies is also most essential. Three agencies are notable; USGS, USF&WS and EPA.

Salinity Control Advisory Council

Cooperation between the federal agencies and the Basin states is also essential, and the program has advanced because of a spirit of good will and a desire to succeed in controlling the salinity of the

Colorado River expressed by all of the states and the federal agencies. To ensure that there would be communication and cooperation, in the Colorado River Basin Salinity Control Act, the Congress created the Colorado River Basin Salinity Control Advisory Council, which is to be composed of no more than three members from each state appointed by the Governors of each of the Colorado River Basin states. The Act directs that the Council shall, among other things, “act as a liaison between both the Secretaries of the Interior and Agriculture and the Administrator of the Environmental Protection Agency and the states in accomplishing the purposes of this title.” The Act further directs that the Secretary will make reports to the Advisory Council, and that the Advisory Council will “recommend to both the Secretary and the Administrator of the Environmental Protection Agency appropriate studies to further projects, techniques, or methods for accomplishing the purposes of this title.”

U.S. Fish & Wildlife Service (USFWS)

Pursuant to authorities and responsibilities as set forth in the Endangered Species Act, Fish and Wildlife Coordination Act, Clean Water Act, National Environmental Policy Act, and the Migratory Bird Treaty Act, the U.S. Fish and Wildlife Service (USFWS) is an active participant in the Colorado River Basin Salinity Control Program. It is primarily through these legislative authorities that the USFWS coordinates with lead Federal agencies and the Basin states.

The Colorado River Basin supports a biological diversity of fish and wildlife resources, as well as a significant number of unique species and important habitats. The Colorado River system has one of the largest number of threatened and endangered species of fish and wildlife in the United States, while providing important habitats for other biological resources of regional, national, and international significance, including: Neotropical migratory birds, migratory waterfowl (ducks, geese, and shorebirds), rare non-migratory birds such as sage grouse, and many economically important species of big game. In addition, specialized habitats such as wetlands and riparian areas provide nesting/rearing habitat for over 200 species of mammals, birds, and amphibians.

In general, USFWS activities consists of coordination with lead federal agencies in evaluating potential impacts to fish and wildlife resources resulting from proposed salinity control projects. Documentation of USFWS concerns and recommendations are typically in the form of Fish and Wildlife Coordination Act reports, Planning Aid Memorandum, biological opinions, and comments on Draft and Final Environmental Assessments and Environmental Impact Statements. Follow-up coordination with project sponsors to ensure appropriate mitigation is also a major thrust of the USFWS. The Salt Lake City, Utah Field Office (Ecological Services) provides overall program coordination for the USFWS.

USFWS participation in the planning process for salinity control projects is provided through a variety of planning/working/coordinating activities and interactions with Reclamation, BLM, EPA, Natural Resource Conservation Service (NRCS), the Forum, state agencies, Indian tribes, and the general public. General fish and wildlife information, as well as lists of threatened and endangered species and their critical

habitats which may occur within salinity control project areas, are provided by the USFWS to the lead federal agencies and other interested parties. Biological opinions rendered under authority of the Endangered Species Act are provided for projects where threatened and endangered species may be affected. Concerns continue to arise over the anticipated effects of salinity control measures on endangered species and wetlands.

Authorization of new salinity control projects will still require in-depth review by the USFWS to ensure the appropriate protection for endangered species and their critical habitats, as well as the replacement of wetland values potentially lost due to construction and operation of new features. USDA's former authorization to mitigate incidental fish and wildlife values lost (on-farm) on a voluntary basis, has been replaced by EQIP. The USFWS will need to more closely monitor the effectiveness of EQIP in achieving adequate mitigation/compensation, both in proportion to and concurrent with various salinity reducing construction practices. Concepts such as mitigation banking may be explored by all participating state and federal agencies to accomplish satisfactory compensation/mitigation results.

U.S. Geological Survey (USGS)

The USGS's Water Resources Division provides and analyzes hydrologic information to assess the nation's water resources. Programs are developed with cooperation and financial support from state, local and other federal agencies. The programs provide hydrologic and geochemical information for evaluation of surface and ground water systems, as well as for management and policy decisions.

To provide information required by the federal, state and local agencies to address Colorado River water quantity and quality issues, the USGS operates and maintains a network of about 520 stream gaging stations and 140 water quality stations in the Colorado River Basin. Streamflow and water-quality information from these stations provide input to the hydrologic database for Reclamation's Colorado River Simulation System. In addition to collecting hydrologic data, the USGS conducts specific studies on surface water, ground water, and water quality.

Environmental Protection Agency (EPA)

The major EPA programs relating to Colorado River salinity control are: (1) water quality management planning; (2) water quality standards; (3) National Pollutant Discharge Elimination System (NPDES) permits; (4) review of National Environmental Policy Act (NEPA) documents; (5) nonpoint source control under Section 319 of the Water Quality Act of 1987; (6) wetlands protection; and (7) the Underground Injection Control (UIC) Program. For the most part, these programs are either implemented by the states under federal statute, (such as the water quality standards program), or delegated to the states by EPA (such as the NPDES program). EPA maintains oversight responsibilities for the assumed and delegated programs, and has responsibility for reviewing and approving water quality standards, including

those for salinity. EPA continues to encourage the Basin states to develop and implement the basinwide and state salinity control strategies.

Section 303 of the Clean Water Act (CWA) requires states to adopt water quality standards pursuant to their own laws which are consistent with the applicable requirements of the CWA. The Colorado River Basin Salinity Control Forum, through its Work Group, has been re-affirming the numeric criteria for salinity and developing a new Basinwide plan of implementation for salinity control for the seven Basin states every three years to satisfy the triennial review requirements of the CWA. Following adoption of the standards by each state, it is the responsibility of the EPA regional administrators to approve or disapprove the standards based on consistency with CWA requirements.

Pursuant to Section 309 of the Clean Air Act, EPA reviews NEPA environmental assessments and environmental impact statements for both salinity and non-salinity control projects of other agencies. Through review of NEPA documents, EPA urges the identification of potential salinity impacts and encourages discussion of mitigation of adverse impacts as required by the Council on Environmental Quality regulations for implementing NEPA (40 CFR Parts 1500-1508). For example, EPA can comment on potential salinity impacts, when appropriate, when reviewing EIS's for grazing and land management, recreational developments, mining, and water development projects. In addition, EPA encourages the development of mitigation measures for adverse impacts to satisfy state and Forum policies for salinity control and through CWA Section 401 certifications for activities subject to federal permitting actions. The Forum policy encouraging the use of water with higher total dissolved solids for industrial purposes is being supported primarily through NEPA review responsibilities.

The basis for wetland protection and mitigation is established in the regulations for compliance with NEPA, Section 404 of the CWA, Executive Order 11990, and USDA policy. However, preserving irrigation-induced wetlands and reducing salt loading to the Colorado River may present conflicts between authorizing legislation and other regulatory programs. A portion of the salt load in the Colorado River system is attributed to seepage and deep percolation from leaking irrigation canals and laterals, and inefficient on-farm irrigation systems and water management. Some of these inefficient irrigation systems and practices are the source of water for many of the wetlands associated with salinity control units. As seepage from irrigation systems is reduced and irrigation efficiencies are improved, some portion of these irrigation-induced wetlands may be impacted or lost. The concept of replacing irrigation-induced wetlands and the need to reduce the salt load in the Colorado River presents difficult choices between environmental values of improved water quality and wetland preservation. Landowners are volunteering to implement wildlife habitat practices, including wetland replacement, as was contemplated by the Salinity Control Act. EPA utilizes NEPA review and other types of coordination with state and federal agencies as the means to participate in wetland assessment, monitoring, replacement, and reporting activities.

Section 319 funds have been appropriated since FY 1990 for the states to implement nonpoint source water pollution control programs. EPA encourages the states to consider salinity control benefits as they make decisions on Section 319 funding for their priority watersheds.

EPA Region VIII administers the Underground Injection Control permit for the Paradox Well salinity control project in Colorado.

CHAPTER 6 - SALINITY STANDARD ADOPTION & IMPLEMENTATION PROCESS

Standards Review Procedures

The Forum, on September 20, 1974, approved a statement of "Principles and Assumptions for Development of Colorado River Salinity Standards and Implementation Plan." Under Principle 7, it is stated:

The plan of implementation shall be reviewed and modified as appropriate from time to time, but at least once each 3 years. At the same time, the (numeric) standards, as required by Section 303(c) (1) of P.L. 92-500 shall be reviewed for the purpose of modifying and adopting standards consistent with the plan so that the Basin states may continue to develop their compact-apportioned waters while providing the best practicable water quality in the Colorado River Basin.

The Colorado River Basin is a large and complex area with many water-quality and water-supply problems. A wide range of research, technical studies, and actions are underway, and much knowledge is yet to be gained. Such studies can bring to the issues a better understanding of natural and human induced salinity sources, and a better comprehension of trends in salt concentrations in the River. This will assist in predictions of future water quality. Reclamation is advancing a new computer model of the Colorado River to help in this regard. Studies are underway to allow for a better understanding of the impacts of salts in the Colorado River on water users. These efforts point to the need for ongoing review of the standards. They also promise a more comprehensive understanding of the River system, which will assist in accomplishing future reviews.

The Forum's Work Group keeps current with salinity control efforts, and suggests revisions as appropriate. The Work Group was particularly active in preparing drafts of the 1999 Review, will assist in the preparation of a supplement, if needed, and will aid the Forum in holding public hearings. The Work Group meets often, as needed, and operates under a schedule which enables the Forum to take action on potential revisions in a timely manner.

For this 1999 Review, after Forum approval, and prior to state action on the review of the numeric criteria and plan of implementation, public review and discussion will be sought by the Forum through public meetings. The Forum will hold at least two regional meetings in the Colorado River Basin to describe the basinwide nature of the salinity problem, the ongoing control program and plan of implementation as recommended in this report, and to solicit comments and views from interested agencies, groups and individuals.

No change has been made in the numeric criteria since their adoption in 1975 by the Basin states and approval by EPA. After having conducted this Review, the Forum has again found the numeric criteria

to be appropriate and recommends no changes in this criteria. By this Review, as has been the case every three years, the Forum has adopted an updated plan of implementation.

Adoption by States

After the final adoption of this report, and perhaps a supplemental report, by the Forum in the fall of 1999, each of the seven Colorado River Basin states will include the report as a part of its own water quality standards and, through procedures established by each state, consider the Review, potentially adopt it, and then submit the report to the appropriate Regional office of EPA for approval. Because the Colorado River Basin contains portions of three EPA regions, Utah, Colorado and Wyoming will make submittals to the EPA Region VIII in Denver, Colorado; New Mexico to EPA Region VI in Dallas, Texas; and Nevada, Arizona and California to EPA Region IX in San Francisco, California.

Action

Although the formation horizon in this report for the plan of implementation extends through the year 2015, there is an urgency to accomplish parts of the plan prior to the next triennial review in the year 2002. With the adoption of this report, the Forum and the states become committed to that end. The federal agencies are a critical part of the Colorado River Basin Salinity Control Program. It is believed that by their involvement in the preparation of this report, those federal agencies will support the plan of implementation and its programs. It is also anticipated that EPA, by approval of the states' submittals, will fully support this salinity control effort.

APPENDIX A

Regulatory History

Title 40 - Protection of Environment
Chapter 1 - ENVIRONMENTAL PROTECTION AGENCY
[FBL 298-5]
Part 120 - WATER QUALITY STANDARDS

Colorado River Systems; Salinity Control Policy and Standards Procedures

The purpose of this notice is to amend 40 CFR Part 120 to set forth a salinity control policy and procedures and requirements for establishing water quality standards for salinity and a plan of implementation for salinity control in the Colorado River System which lies within the State of Arizona, California, Colorado, Nevada, New Mexico, Utah and Wyoming pursuant to section 303 of the Federal Water Pollution Control Act, as amended (33 U.S. C. 1313). A notice proposing such policy and standards procedures was issued on June 10, 1974 (39 FR 20703, 39 FR 24517).

High salinity (total dissolved solids) is recognized as a significant water quality problem causing adverse impacts on water uses. Salinity concentrations are affected by two basic processes: (a) Salt loading - the addition of mineral salts from various natural and man-made sources, and (b) salt concentrating - the Loss of water from the system through stream depletion.

Studies to date have demonstrated that the high salinity of stream systems can be alleviated. Although further study may be required to determine the economic and technical feasibility of controlling specific sources, sufficient information is available to develop a salinity control program.

Salinity standards for the Colorado River System would be useful in the formulation of an effective salinity control program. In developing these standards, the seven States must cooperate with one another and the Federal Government to support and implement the conclusions and recommendations adopted April 27, 1972, by the reconvened 7th Session of the conference in the Matter of Pollution of the Interstate Waters of the Colorado River and its Tributaries.

Public hearings on the proposed regulation were held in Las Vegas, Nevada on August 19, 1974, and in Denver, Colorado, on August 21, 1974. Public comments were provided at the hearings and also by letter during the review period. A summary of major comments and Environmental Protection Agency response follows:

(1) The Colorado River Basin Salinity Control Forum stated that it did not object to the proposed regulations, and believed that it satisfied the requirements of section 303 (b)(2) of P.L. 92-500 until October 18, 1975. The Forum reported that the seven Colorado River Basin States were actively working on the development of water quality standards and a plan of implementation of salinity control.

(2) The Colorado River Water Conservation District inquired as to whether the definition for the Colorado River Basin contained in Article II(f) of the Colorado River Compact of 1922 would be followed in the development of salinity standards and the salinity control plan.

The requirement of establishing water quality standards and an implementation plan apply to the Colorado River System as defined in Part 120.5(a) of this regulation. This definition is consistent with the definition of the Colorado River System contained in Article II(f) and II(g) define the Basin to include the System plus areas outside the drainage area which are served by the Colorado River System. The Environmental Protection Agency (EPA) will require that the standards and implementation plan consider the impacts of basinwide uses, e.g. transmountain diversions, on salinity effects in the System, but the establishment of standards and implementation plans pursuant to this regulation will not be required for streams located outside the System.

The District also questioned the feasibility of relying on irrigation improvement programs as a means of alleviating the salinity problem.

EPA believes that adequate information is available to initiate controls for irrigated agriculture, yet at the same time acknowledges that additional work is needed to demonstrate the efficacy of certain control measures. Projects presently being supported by EPA and others should demonstrate the adequacy of various control measures including management and non-structural techniques. These measures will be considered during the development of the implementation plan.

(3) The Environmental Defense Fund (EDF) testified that it believed that EPA was not complying with the requirements of the Federal Water Pollution Control Act, as amended, chiefly because of EPA's late response to the timetable delineated in the Act for establishing standards, and also because numerical standards still have not been set for the Colorado River System. EDF called upon EPA to withdraw the proposed regulation and promptly promulgate numerical limits for salinity.

EPA believes that a move to promulgate numerical standards at this time should cause even further delays in controlling salinity due to the problems involved with obtaining interstate cooperation and public acceptance of such a promulgation.

(4) The Sierra Club raised a number of objections to the proposed regulation, principally because, in its opinion, it permits further development of the water of the Colorado River without requiring that adequate salinity controls be on line prior to development. Specific suggestions are:

(a) Section 120.5(e)(3). Shorten the deadline for submission of the standards and implementation plan to May 30, 1975.

EPA believes that this would not allow adequate time due to the complexities of the problem, the interstate coordination needed and the time requirements for public hearings. The October 18, 1975 date is consistent with the requirements of the Federal Water Pollution Control Act, as amended, for the three year review and revision of standards. The schedule set forth by the Colorado River Basin Salinity Control Forum calls for development of draft standards and an implementation plan by February 1975 in order to allow time for public participation prior to promulgation.

(b) Section 120.5(c)(2). Delete "as expeditiously as practicable."

The date of July 1, 1983, remains the goal for accomplishment of implementation plans as stated in § 120.5(c)(2)(iii). It is the purpose of this language to accelerate progress by the States toward this goal where possible.

(c) Delete “while the basin States continue to develop their compact apportioned waters.”

In recognition of the provisions of the Colorado River Compact of 1922 and until such time that the relationship between the Compact and the Federal Water Pollution Control Act, as amended, is clarified, EPA believes that development may proceed provided that measures are taken to offset the salinity increases resulting from further development.

(d) Section 120.5(c)(2)(iv). Add language to describe conditions under which temporary increases above the 1972 levels will be allowed.

EPA believes that this matter should be addressed in further detail in the formulation review and acceptance of the implementation plan, not in the regulation.

(e) Add a new subsection on financing on control measures.

EPA believes that this, too, is an issue that should be handled as part of the implementation plan.

(f) Add a new subsection delineating requirements for evaluating control plans and restricting consideration of controls for the Blue Spring on the Little Colorado River.

EPA believe these issues should also be addressed as part of the implementation plan. It should be noted that nothing in this regulation removes the requirement for assessing environmental impacts and preparing environmental impact statements for control measures.

(g) Add a new section requiring public hearings.

EPA’s public participation regulations appear at 40 CFR 105 and apply to all actions to be taken by the States and Federal Government pursuant to the Act. States have provided for public participation throughout the initial water quality standards review process. We expect the States to do so in this situation and see no need to set forth additional requirements.

(h) Add a new section stating that the implementation plan will be published in the Federal Register.

EPA expects there will be substantial public participation at the State and local level prior to adoption of the plan. The salinity standards are expected to be published in the Federal Register, but the size and complexity of the plan may militate against its publication. At the very least, the plan will be available for review at appropriate EPA and State offices. Notice of its availability will be published in the Federal Register, and 60 days will be allowed for public review and comment.

(i) Add new subsection stating that EPA will promulgate standards if the States fail to do so as prescribed in this regulation.

Section 303 of the Federal Water Pollution Control Act provides for promulgation by EPA where the States fail to adopt standards requested by the Administrator, or where the Administrator determines Federal promulgation is necessary to carry out the purpose of the Act. EPA's responsibility to promulgate standards if the States fail to do so is thus expressed in the Statute itself; the Agency does not believe that recitation of the statutory duty in this particular rulemaking is necessary.

(5) The American Farm Bureau Federation, California Farm Bureau Federation, Nevada Farm Bureau Federation, and the New Mexico Farm and Livestock Bureau believe that standards should not be set until further evaluation of the problems and opportunities for control are completed.

EPA believes that adequate information is available for setting standards and formulation controls, and while it recognizes that additional work is needed on specific aspects of solutions, it believes that further delay without any action is not appropriate.

Records of the hearings and comments received by letter during the review period are available for public inspection at the regional offices of the Environmental Protection Agency at 1860 Lincoln Street in Denver, Colorado, at 100 California Street in San Francisco, California, at 1609 Patterson Street in Dallas, Texas, and at the Environmental Protection Agency Freedom of Information Center at 401 M Street SW in Washington, D.C.

This regulation sets forth a policy of maintaining salinity concentrations in the lower main stem of the Colorado River at or below 1972 average levels and requires the Colorado River System States to promulgate water quality standards. The first step will be the establishment of procedures within 30 days of the effective date of these regulations which will lead to adoption on or before October 18, 1975, of water quality standards for salinity including numeric criteria and an implementation plan of salinity control.

Except as provided in this regulation the interstate and intrastate standards previously adopted by the States of Arizona, California, Colorado, Nevada, New Mexico, Utah and Wyoming and approved by the Environmental Protection Agency are the effective water quality standards under section 303 of the Act for interstate and intrastate waters within those States. Where the regulations set forth below are inconsistent with the referenced state standards, these regulations will supersede such standards to the extent of the inconsistency.

In consideration of the foregoing, 40 CFR Part 120 is amended as follows:

1. Section 120.5 is added to read as set forth below:

§ 120.5 Colorado River System Salinity Standards and Implementation Plan.

(a) "Colorado River System" means that portion of the Colorado River and its tributaries within the United States of America.

(b) It shall be the policy that the flow weighted average annual salinity in the lower main stem of the Colorado River System be maintained at or below the average value found during 1972. To carry out this policy, water quality standards for salinity and a plan of implementation for salinity control shall be developed and implemented in accordance with the principles of paragraph (c) below.

(c) The States of Arizona, California, Colorado, Nevada, New Mexico, Utah and Wyoming are required to adopt and submit for approval to the Environmental Protection Agency on or before October 18, 1975:

(1) Adopted water quality standards for salinity including numeric criteria consistent with the Policy stated above for appropriate points in the Colorado River System; and

(2) A plan to achieve compliance with these standards as expeditiously as practicable providing that :

(i) The plan shall identify State and Federal regulatory authorities and programs necessary to achieve compliance with the plan.

(ii) The salinity problem shall be treated as a basinwide problem that needs to be solved in order to maintain lower main stem salinity at or below 1972 levels while the basin States continue to develop their compact apportioned waters.

(iii) The goal of the plan shall be to achieve compliance with the adopted standards by July 1, 1983. The date of compliance with the adopted standards shall take into account the necessity for Federal salinity control actions set forth in the plan. Abatement measures within the control for the States shall be implemented as soon as practicable.

(iv) Salinity levels in the lower main stem may temporarily increase above the 1972 levels if control measures to offset the increases are included in the control plan. However, compliance with 1972 levels shall be a primary consideration.

(v) The feasibility of establishing an interstate institution for salinity management shall be evaluated.

(d) The States are required to submit to the respective Environmental Protection Agency Regional Administrator established procedures for achieving (c)(1) and (c)(2) above within 30 days of the effective date of these regulations and to submit progress reports quarterly thereafter. EPA will on a quarterly basis determine the progress being made in the development of salinity standards and the implementation plan.

§ 120.10 [Amended]

§ 120.10 is amended by adding to the paragraphs entitled “Arizona”, “California”, “Colorado”, “Nevada”, “New Mexico”, “Utah”, and “Wyoming” a salinity control policy and procedures and requirements for establishing water quality standards for salinity control in the Colorado River System.

(Sec. 303, Pub. L. 82-500, 56 Stat. 816 (33 U.S.C. 1313))

Effective date: December 18, 1974.

Dated: December 11, 1974

APPENDIX B

Forum Policies

POLICY FOR IMPLEMENTATION OF COLORADO RIVER SALINITY STANDARDS THROUGH THE NPDES PERMIT PROGRAM

Prepared by

The Colorado River Basin Salinity Control Forum

February 28, 1977

In November 1976, the United States Environmental Protection Agency Regional Administrators notified each of the seven Colorado River Basin states of the approval of the water quality standards for salinity for the Colorado River System as contained in the document entitled "Proposed Water Quality Standards for Salinity Including Numeric Criteria and Plan of Implementation for Salinity Control, Colorado River System, June 1975," and the supplement dated August 25, 1975. The salinity standards including numeric criteria and a plan of implementation provide for a flow weighted average annual numeric criteria for three stations in the lower main stem of the Colorado River: below Hoover Dam, below Parker Dam, and at Imperial Dam.

The Plan of Implementation is comprised of a number of Federal and non-Federal projects and measures to maintain the flow-weighted average annual salinity in the Lower Colorado River at or below numeric criteria at the three stations as the Upper and Lower Basin states continue to develop their compact-apportioned waters. One of the components of the Plan consists of the placing of effluent limitations, through the National Pollutant Discharge Elimination System (NPDES) permit program, on industrial and municipal discharges.

The purpose of this policy is to provide more detailed guidance in the application of salinity standards developed pursuant to Section 303 and through the NPDES permitting authority in the regulation of municipal and industrial sources. (See Section 402 of the Federal Water Pollution Control Act.) This policy is applicable to discharges that would have an impact, either direct or indirect on the lower main stem of the Colorado River System. The lower main stem is defined as that portion of the main river from Hoover Dam to Imperial Dam.

I. Industrial Sources

The Salinity Standards state that "the objective for discharges shall be a no-salt return policy whenever practicable." This is the policy that shall be followed in issuing NPDES discharge permits for all new industrial sources, and upon the reissuance of permits for all existing industrial sources, except as provided herein. The following addresses those cases where no-discharge of salt may be deemed not to be practicable.

A. New Construction

1. New construction is defined as any facility from which a discharge may occur, the construction of which is commenced after October 18, 1975. (Date of submittal of water quality standards as required by 40 CFR 120, December 11, 1974.) Appendix A provides guidance on new construction determination.
 - a. The permitting authority may permit the discharge of salt upon a satisfactory demonstration by the permittee that it is not practicable to prevent the discharge of all salt from proposed new construction.
 - b. The demonstration by the applicant must include information on the following factors relating to the potential discharge:
 - (1) Description of the proposed new construction.
 - (2) Description of the quantity and salinity of the water supply.
 - (3) Description of water rights, including diversions and consumptive use quantities.
 - (4) Alternative plans that could reduce or eliminate salt discharge. Alternative plans shall include:
 - (a) Description of alternative water supplies, including provisions of water reuse, if any.
 - (b) Description of quantity and quality of proposed discharge.
 - (c) Description of how salts removed from discharges shall be disposed of to prevent such salts from entering surface waters or groundwater aquifers.
 - (d) Costs of alternative plans in dollars per ton of salt removed.
 - (5) Of the alternatives, a statement as to the one plan for reduction of salt discharge that the applicant recommends be adopted.

- (6) Such other information pertinent to demonstration of non-practicability as the permitting authority may deem necessary.
- c. In determining what permit conditions shall be required, the permit issuing authority shall consider, but not be limited to the following:
- (1) The practicability of achieving no discharge of salt.
 - (2) Where no discharge is determined not to be practicable:
 - (a) The impact of the total proposed salt discharge of each alternative on the lower main stem in terms of both tons per year and concentration.
 - (b) Costs per ton of salt removed from the discharge for each plan alternative.
 - (c) Capability of minimizing salinity discharge.
 - (3) With regard to both points, one and two above, the compatibility of state water laws with either the complete elimination of a salt discharge or any plan for minimizing a salt discharge.
 - (4) The no-salt discharge requirement may be waived in those cases where the salt load reaching the main stem of the Colorado River is less than one ton per day or 350 tons per year, whichever is less. Evaluation will be made on a case-by-case basis.

B. Existing Facilities

1. The permitting authority may permit the discharge of salt upon a satisfactory demonstration by the permittee that it is not practicable to prevent the discharge of all salt from an existing facility.
2. The demonstration by the applicant must include, in addition to that required under Section I,A,1,b; the following factors relating to the potential discharge:
 - a. Existing tonnage of salt discharged and volume of effluent.
 - b. Cost of modifying existing industrial plant to provide for no salt discharge.

- c. Cost of salt minimization.
3. In determining what permit conditions shall be required, the permit issuing authority shall consider the items presented under I, A, 1, c (2), and in addition; the annual costs of plant modification in terms of dollars per ton of salt removed for:
 - a. No salt return.
 - b. Minimizing salt return.
4. The no-salt discharge requirement may be waived in those cases where the salt load reaching the main stem of the Colorado River is less than one ton per day or 350 tons per year, whichever is less. Evaluation will be made on a case-by-case basis.

II. Municipal Discharges

The basic policy is that a reasonable increase in salinity shall be established for municipal discharges to any portion of the Colorado River stream system that has an impact on the lower main stem. The incremental increase in salinity shall be 400 mg/l or less, which is considered to be a reasonable incremental increase above the flow weighted average salinity of the intake water supply.

- A. The permitting authority may permit a discharge in excess of the 400 mg/l incremental increase at the time of issuance or reissuance of a NPDES discharge permit, upon satisfactory demonstration by the permittee that it is not practicable to attain the 400 mg/l limit.
- B. Demonstration by the applicant must include information on the following factors relating to the potential discharge:
 1. Description of the municipal entity and facilities.
 2. Description of the quantity and salinity of intake water sources.
 3. Description of significant salt sources of the municipal wastewater collection system, and identification of entities responsible for each source, if available.
 4. Description of water rights, including diversions and consumptive use quantities.

5. Description of the wastewater discharge, covering location, receiving waters, quantity, salt load, and salinity.
 6. Alternative plans for minimizing salt contribution from the municipal discharge. Alternative plans should include:
 - a. Description of system salt sources and alternative means of control.
 - b. Cost of alternative plans in dollars per ton, of salt removed from discharge.
 7. Such other information pertinent to demonstration of non-practicability as the permitting authority may deem necessary.
- C. In determining what permit conditions shall be required, the permit issuing authority shall consider the following criteria including, but not limited to:
1. The practicability of achieving the 400 mg/l incremental increase.
 2. Where the 400 mg/l incremental increase is not determined to be practicable:
 - a. The impact of the proposed salt input of each alternative on the lower main stem in terms of tons per year and concentration.
 - b. Costs per ton of salt removed from discharge of each alternative plan.
 - c. Capability of minimizing the salt discharge.
- D. If, in the opinion of the permitting authority, the data base for the municipal waste discharger is inadequate, the permit will contain the requirement that the municipal waste discharger monitor the water supply and the wastewater discharge for salinity. Such monitoring program shall be completed within 2 years and the discharger shall then present the information as specified above.
- E. Requirements for establishing incremental increases may be waived in those cases where the incremental salt load reaching the main stem of the Colorado River is less than one ton per day or 350 tons per year, whichever is less. Evaluation will be made on a case-by-case basis.
- F. All new and reissued NPDES permits for all municipalities shall require monitoring of the salinity of the intake water supply and the wastewater treatment plant effluent in accordance with the following guidelines:

Treatment Plant <u>Desicin Capacity</u>	Monitoring <u>Frequency</u>	Type of <u>Sample</u>
<1.0 MGD*	Quarterly	Discrete
1.0 - 5.0 MGD	Monthly	Composite
>5.0 - 50.0 MGD	Weekly	Composite
50.0 MGD	Daily	Composite

1. Analysis for salinity may be either as total dissolved solids (TDS) or be electrical conductivity where a satisfactory correlation with TDS has been established. The correlation should be based on a minimum of five different samples.
2. Monitoring of the intake water supply may be at a reduced frequency where the salinity of the water supply is relatively uniform.

APPENDIX A

Guidance on New Construction Determination

For purposes of determining a new construction, a source should be considered new if by October 18, 1975, there has not been:

- I. Significant site preparation work such as major clearing or excavation; and/or
- II. Placement, assembly or installation of unique facilities or equipment at the premises where such facilities or equipment will be used; and/or
- III. Any contractual obligation to purchase unique facilities or equipment. Facilities and equipment shall include only the major items listed below, provided that the value of such items represents a substantial commitment to construct the facility:
 - A. structures; or
 - B. structural materials; or
 - C. machinery; or
 - D. process equipment; or
 - E. construction equipment.
- IV. Contractual obligation with a firm to design, engineer, and erect a completed facility (i.e., a turnkey plant).

**POLICY FOR USE OF
BRACKISH AND/OR SALINE WATERS
FOR INDUSTRIAL PURPOSES**

Adopted by
The Colorado River Basin Salinity Control Forum

September 11, 1980

The states of the Colorado River Basin, the federal Executive Department, and the Congress have all adopted as a policy that the salinity in the lower main stem of the Colorado River shall be maintained at or below the flow-weighted average values found during 1972, while the Basin states continue to develop their compact-apportioned waters. In order to achieve this policy, all steps which are practical and within the framework of the administration of states* water rights must be taken to reduce the salt load of the river. One such step was the adoption in 1975 by the Forum of a policy regarding effluent limitations for industrial discharges with the objective of “no-salt return” wherever practicable. Another step was the Forum*s adoption in 1977 of the “Policy for Implementation of Colorado River Salinity Standards through the NPDES Permit Program.” These policies are part of the basinwide plan of implementation for salinity control which has been adopted by the seven Basin states.

The Forum finds that the objective of maintaining 1972 salinity levels would be served by the exercise of all feasible measures including, wherever practicable, the use of brackish and/or saline waters for industrial purposes.

The summary and page 32 of the Forum*s 1978 Revision of the Water Quality Standards for Salinity state: “The plan also contemplates the use of saline water for industrial purposes whenever practicable,...” In order to implement this concept and thereby further extend the Forum*s basic salinity policies, the Colorado River Basin states support the Water and Power Resources Service (WPRS) appraisal study of saline water collection, pretreatment and potential industrial use.

The Colorado River Basin contains large energy resources which are in the early stages of development. The WPRS study should investigate the technical and financial feasibility of serving a significant portion of the water requirements of the energy industry and any other industries by the use of Basin brackish and/or saline waters. The Forum recommends that:

- I. The Colorado River Basin states, working with federal agencies, identify, locate and quantify such brackish and/or saline water sources.
- II. Information on the availability of these waters be made available to all potential users.
- III. Each state encourage and promote the use of such brackish and/or saline waters, except where it would not be environmentally sound or economically feasible, or would significantly increase consumptive use of Colorado River System water in the state above that which would otherwise occur.
- IV. The WPRS, with the assistance of the states, encourages and promotes the use of brackish return flows from federal irrigation projects in lieu of fresh water sources, except where it would not be environmentally sound or economically feasible, or would significantly increase consumptive use of Colorado River System water.

- V. The WPRS considers a federal contribution to the costs of industrial use of brackish and/or saline water, where cost-effective, as a joint private-government salinity control measure. Such activities shall not delay the implementation of the salinity control projects identified in Title II of P.L. 93-320.

**POLICY FOR IMPLEMENTATION OF
COLORADO RIVER SALINITY STANDARDS
THROUGH THE NPDES PERMIT PROGRAM
FOR INTERCEPTED GROUND WATER**

Adopted by
The Colorado River Basin Salinity Control Forum

October 20, 1982

The States of the Colorado River Basin in 1977 agreed to the "Policy for Implementation of Colorado River Salinity Standards through the NPDES Permit Program" with the objective for industrial discharge being "no-salt return" whenever practicable. That policy required the submittal of information by the applicant on alternatives, water rights, quantity, quality, and costs to eliminate or minimize the salt discharge. The information is for use by the NPDES permit-issuing agency in evaluating the practicability of achieving "no-salt" discharge.

There are mines and wells in the Basin which discharge intercepted ground waters. The factors involved in those situations differ somewhat from those encountered in other industrial discharges. Continued development will undoubtedly result in additional instances in which permit conditions must deal with intercepted ground water.

The discharge of ¹intercepted ground water needs to be evaluated in a manner consistent with the overall objective of "no-salt return" whenever practical. The following provides more detailed guidance for those situations where ground waters are intercepted with resultant changes in ground-water flow regime.

- I. The "no-salt" discharge requirement may be waived at the option of the permitting authority in those cases where the discharged salt load reaching the main stem of the Colorado River is less than one ton per day or 350 tons per year whichever is less. Evaluation will be made on a case-by-case basis.
- II. Consideration should be given to the possibility that the ground water, if not intercepted, normally would reach the Colorado River System in a reasonable time frame. An industry desiring such consideration must provide detailed information including a description of the topography, geology, and hydrology. Such information must include direction and rate of ground-water flow; chemical quality and quantity of ground water; and the location, quality, and quantity of surface streams and springs that might be affected. If the information adequately demonstrates that the ground water to be intercepted normally would reach the river system in a reasonable time frame and would contain approximately the same or greater salt load than if intercepted, and if no significant localized problems would be created, then the permitting agency may waive the "no-salt" discharge requirement.
- III. In those situations where the discharge does not meet the criteria in I or II above, the applicant will be required to submit the following information for consideration:

¹ The term "intercepted ground water" means all ground water encountered during mining or other industrial operations.

- A. Description of the topography, geology, and hydrology. Such information must include the location of the development, direction and rate of ground-water flow, chemical quality and quantity of ground water, and relevant data on surface streams and springs that are or might be affected. This information should be provided for the conditions with and without the project.
- B. Alternative plans that could substantially reduce or eliminate salt discharge. Alternative plans must include:
 - 1. Description of water rights, including beneficial uses, diversions, and consumptive use quantities.
 - 2. Description of alternative water supplies, including provisions for water reuse, if any.
 - 3. Description of quantity and quality of proposed discharge.
 - 4. Description of how salts removed from discharges shall be disposed of to prevent their entering surface waters or ground-water aquifers.
 - 5. Technical feasibility of the alternatives.
 - 6. Total construction, operation, and maintenance costs; and costs in dollars per ton of salt removed from the discharge.
 - 7. Closure plans to ensure termination of any proposed discharge at the end of the economic life of the project.
 - 8. A statement as to the one alternative plan for reduction of salt discharge that the applicant recommends be adopted, including an evaluation of the technical, economic, and legal practicability of achieving no discharge of salt.
 - 9. Such information as the permitting authority may deem necessary.
- IV. In determining whether a “no-salt” discharge is practicable, the permit-issuing authority shall consider, but not be limited to, the water rights and the technical, economic, and legal practicability of achieving no discharge of salt.
- V. Where “no-salt” discharge is determined not to be practicable the permitting authority shall, in determining permit conditions, consider:
 - A. The impact of the total proposed salt discharge of each alternative on the lower main stem in terms of both tons per year and concentration.
 - B. Costs per ton of salt removed from the discharge for each plan alternative.
 - C. The compatibility of state water laws with each alternative.
 - D. Capability of minimizing salinity discharge.
 - E. The localized impact of the discharge.

- F. Minimization of salt discharges and the preservation of fresh water by using intercepted ground water for industrial processes, dust control, etc. whenever it is economically feasible and environmentally sound.

**POLICY FOR IMPLEMENTATION OF
COLORADO RIVER SALINITY STANDARDS
THROUGH THE NPDES PERMIT PROGRAM
FOR FISH HATCHERIES**

Adopted by
The Colorado River Basin Salinity Control Forum

October 28, 1988

The states of the Colorado River Basin in 1977 adopted the “Policy for Implementation of Colorado River Salinity Standards through the NPDES Permit Program.” The objective was for “no-salt return” whenever practicable for industrial discharges and an incremental increase in salinity over the supply water for municipal discharges. The Forum addressed the issue of intercepted ground water under the 1977 policy, and adopted a specific policy dealing with that type of discharge.

A specific water use and associated discharge which has not been here-to-fore considered is discharges from fish hatcheries. This policy is limited exclusively to discharges from fish hatcheries within the Colorado River Basin. The discharges from fish hatcheries need to be addressed in a manner consistent with the 1977 and 1980 Forum policies.

The basic policy for discharges from fish hatcheries shall permit an incremental increase in salinity of 100 mg/l or less above the flow weighted average salinity of the intake supply water. The 100 mg/l incremental increase may be waived if the discharged salt load reaching the Colorado River system is less than one ton per day, or 350 tons per year, whichever is less. Evaluation is to be made on a case-by-case basis.

- I. The permitting authority may permit a discharge in excess of the 100 mg/l incremental increase at the time of issuance or reissuance of a NPDES discharge permit. Upon satisfactory demonstration by the permittee that it is not practicable to attain the 100 mg/l limit.
- II. Demonstration by the applicant must include information on the following factors relating to the potential discharge:
 - A. Description of the fish hatchery and facilities.
 - B. Description of the quantity and salinity of intake water sources.
 - C. Description of salt sources in the hatchery.
 - D. Description of water rights, including diversions and consumptive use quantities.
 - E. Description of the discharge, covering location, receiving waters, quantity salt load, and salinity.
 - F. Alternative plans for minimizing salt discharge from the hatchery. Alternative plans should include:

1. Description of alternative means of salt control.
 2. Cost of alternative plans in dollars per ton, of salt removed from discharge.
 - G. Such other information pertinent to demonstration of non-practicability as the permitting authority may deem necessary.
- III. In determining what permit conditions shall be required, the permit-issuing authority shall consider the following criteria including, but not limited to:
- A. The practicability of achieving the 100 mg/l incremental increase.
 - B. Where the 100 mg/l incremental increase is not determined to be practicable:
 1. The impact of the proposed salt input of each alternative on the lower main stem in terms of tons per year and concentration.
 2. Costs per ton of salt removed from discharge of each alternative plan.
 3. Capability of minimizing the salt discharge.
- IV. If, in the opinion of the permitting authority, the database for the hatchery is inadequate, the permit will contain the requirement that the discharger monitor the water supply and the discharge for salinity. Such monitoring program shall be completed within two years and the discharger shall then present the information as specified above.
- V. All new and reissued NPDES permits for all hatcheries shall require monitoring of the salinity of the intake water supply and the effluent at the time of peak fish population.
- A. Analysis for salinity may be either as total dissolved solids (TDS) or be electrical conductivity where a satisfactory correlation with TDS has been established. The correlation should be based on a minimum of five different samples.

APPENDIX C

NPDES Permits

LEGEND

**NPDES PERMITS
EXPLANATION CODES**

**COLORADO RIVER BASIN SALINITY CONTROL FORUM
October 1, 1997 — September 30, 1998**

NPDES permits are reviewed under two different criteria under Forum policy; these being municipal and industrial. In order for a permittee to be in compliance under the municipal criteria, the increase in concentration between inflow and outflow can not be greater than 400 mg/L. Forum industrial criteria requires that no industrial user discharges more than 1.00 ton/day. Under Forum policy there can be granted exceptions to these limitations by the states. The following gives an explanation of the current status of the NPDES permits. Because at any given time many of the approximate 650 permits identified in this list are being reviewed, reissued, and/or terminated, and new discharge permits are being filed, this list must be considered as being subject to frequent change.

MUNICIPAL

INDUSTRIAL

(M)	Municipal user in compliance with Forum policy.	(I)	Industrial user in compliance with Forum policy.
(M-1)	Permit has expired or been revoked. No discharge.	(I-1)	Permit has expired or been revoked. No discharge.
(M-2)	Permittee did not discharge during the reporting period.	(I-2)	Permittee did not discharge during the reporting period.
(M-3)	Measurement of TDS is not currently required, but the state and/or EPA plans to require measurements of both inflow and outflow when the permit is reissued.	(I-3)	Measurement of TDS is not currently required, but the state and/or EPA plans to require measurements of both volume and concentration of outflow when the permit is reissued.
	Measurements of inflow are not consistent with Forum policy;	(I-4)	Either concentration or volume of outflow are not currently being reported, thus the permittee is in violation of Forum policy. It is not known if the discharge is in excess of the <1.00 ton/day requirement.
(M-4A)	Therefore, it is not known whether or not this municipal user is in compliance.		Permittee appears to be in violation of Forum policy in that discharge of salts is >1.00 ton/day.
(M-4B)	However, since outflow concentration is less than 500 mg/L it is presumed that this permit is not in violation of the # 400 mg/L increase.	(I-5A)	No provision has been made allowing this violation of Forum policy.
(M-5)	Permittee is in violation of Forum policy in that there is an increase in concentration of >400 mg/L over the source waters.	(I-5B)	Though discharge is >1.00 ton/day, in keeping with Forum policy the permittee has demonstrated the salt reduction is not practicable and the requirement has been waived.
(M-5A)	The state is currently working to bring permittee into compliance.	(I-5C)	The use of ground water under this permit is for geothermal energy and only heat is extracted. The intercepted salt and water are naturally tributary to the Colorado River System and hence, this discharge does not increase salt in the river. The permit is covered by the Forum's policy on intercepted ground waters.
(M-6)	This permit requires no discharge or discharge only under rare and extreme hydrologic conditions. Thus, flow and concentration measurements are not required.	(I-5D)	This permit is in compliance with the Forum's policy for fish hatcheries. The use of the water is a one-time pass through, and the incremental increase in salinity is # 100 mg/L.
(M-7)	Insufficient data to know the status of this permit.	(I-5E)	This permit is for the interception and passage of ground waters and thus is excepted under the Forum's policy on intercepted ground waters .
*	Permit issued to a federal agency or an Indian tribe and the responsibility of EPA.	(I-6)	This permit requires no discharge or discharge only under rare and extreme hydrologic conditions. Thus, flow and concentration measurements are not required.
		(I-7)	Insufficient data to know the current status of this permit.

LEGEND

NPDES PERMITS EXPLANATION CODES

COLORADO RIVER BASIN SALINITY CONTROL FORUM October 1, 1997 — September 30, 1998

NPDES permits are reviewed under two different criteria under Forum policy; these being municipal and industrial. In order for a permittee to be in compliance under the municipal criteria, the increase in concentration between inflow and outflow can not be greater than 400 mg/L. Forum industrial criteria requires that no industrial user discharges more than 1.00 ton/day. Under Forum policy there can be granted exceptions to these limitations by the states. The following gives an explanation of the current status of the NPDES permits. Because at any given time many of the approximate 650 permits identified in this list are being reviewed, reissued, and/or terminated, and new discharge permits are being filed, this list must be considered as being subject to frequent change.

<u>MUNICIPAL</u>	<u>INDUSTRIAL</u>
(M) Municipal user in compliance with Forum policy.	(I) Industrial user in compliance with Forum policy.
(M-1) Permit has expired or been revoked. No discharge.	(I-1) Permit has expired or been revoked. No discharge.
(M-2) Permittee did not discharge during the reporting period.	(I-2) Permittee did not discharge during the reporting period.
(M-3) Measurement of TDS is not currently required, but the state and/or EPA plans to require measurements of both inflow and outflow when the permit is reissued.	(I-3) Measurement of TDS is not currently required, but the state and/or EPA plans to require measurements of both volume and concentration of outflow when the permit is reissued.
Measurements of inflow are not consistent with Forum policy;	(I-4) Either concentration or volume of outflow are not currently being reported, thus the permittee is in violation of Forum policy. It is not known if the discharge is in excess of the <1.00 ton/day requirement.
(M-4A) Therefore, it is not known whether or not this municipal user is in compliance.	
(M-4B) However, since outflow concentration is less than 500 mg/L it is presumed that this permit is not in violation of the #400 mg/L increase.	Permittee appears to be in violation of Forum policy in that discharge of salts is >1.00 ton/day.
(M-5) Permittee is in violation of Forum policy in that there is an increase in concentration of >400 mg/L over the source waters.	(I-5A) No provision has been made allowing this violation of Forum policy.
(M-5A) The state is currently working to bring permittee into compliance.	(I-5B) Though discharge is >1.00 ton/day, in keeping with Forum policy the permittee has demonstrated the salt reduction is not practicable and the requirement has been waived.
(M-6) This permit requires no discharge or discharge only under rare and extreme hydrologic conditions. Thus, flow and concentration measurements are not required.	(I-5C) The use of ground water under this permit is for geothermal energy and only heat is extracted. The intercepted salt and water are naturally tributary to the Colorado River System and hence, this discharge does not increase salt in the river. The permit is covered by the Forum's policy on intercepted ground waters.
(M-7) Insufficient data to know the status of this permit.	(I-5D) This permit is in compliance with the Forum's policy for fish hatcheries. The use of the water is a one-time pass through, and the incremental increase in salinity is # 100 mg/l.
	(I-5E) This permit is for the interception and passage of ground waters and thus is excepted under the Forum's policy on intercepted ground waters .
	(I-6) This permit requires no discharge or discharge only under rare and extreme hydrologic conditions. Thus, flow and concentration measurements are not required.
*	(I-7) Insufficient data to know the current status of this permit.
Permit issued to a federal agency or an Indian tribe and the responsibility of EPA.	

LEGEND (continued)
NPDES PERMITS
REACH DEMARCATIONS

COLORADO RIVER BASIN SALINITY CONTROL FORUM

In order to provide a better understanding of the location of the various NPDES permits and the geographical sequence in the Colorado River System, each of the following NPDES permits is identified with a Colorado River reach number. The reach numbers have their origin in the old CRSS river model. Though this model is no longer used, the reach numbers assist in understanding the general location of the permits. The reaches are defined as:

100	Upper Main Stem	from headwaters of Colorado River to Colorado River near Cameo
190	Taylor Park	from headwaters of Gunnison River to above Blue Mesa Reservoir
200	Blue Mesa	from above Blue Mesa Reservoir to below Blue Mesa Dam
210	Morrow Point	from below Blue Mesa Dam to Crystal Reservoir
220	Lower Gunnison	from Crystal Reservoir to confluence with Colorado River
300	Grand Valley	from Colorado River near Cameo to confluence with Green River
310	Dolores River	from headwaters of Dolores River to confluence with Colorado River
401	Fontenelle	from headwaters of Green River to Green River near Green River, WY
411	Flaming Gorge	from Green River near Green River, WY to confluence with White and Duchesne Rivers
500	Yampa River	from headwaters of Yampa River to confluence with Green River
510	White River	from headwaters of White River to confluence with Green River
600	Green River	Green River from confluence with White and Duchesne Rivers to confluence with Colorado River
610	Duchesne River	from headwaters of Duchesne River to confluence with Green River
700	Lake Powell	Colorado River from confluence of with Green River to Lees Ferry
710	San Rafael River	from headwaters of San Rafael River to confluence with Green River
801	Upper San Juan River	from headwaters of San Juan River to San Juan near Bluff
802	Lower San Juan River	from San Juan near Bluff to confluence with Lake Powell
900	Glen Canyon to Lake Mead	Colorado River from Lees Ferry to backwaters of Lake Mead
905	Virgin River	from headwaters of Virgin River to backwaters of Lake Mead
910	Lake Mead	from backwaters of Lake Mead to Colorado River below Hoover Dam
920	Lake Mohave	Colorado River from below Hoover Dam down to I-40 bridge
930	Lake Havasu	Colorado River from I-40 bridge to below Parker Dam
940	Parker Dam to Imperial Dam	Colorado River from below Parker Dam to above Imperial Dam
945	Imperial Dam	Colorado River from above Imperial Dam to Gila and Yuma users
950	Below Imperial Dam	Colorado River from Gila and Yuma Users to Mexico

NPDES PERMITS

Colorado River Basin Salinity Control Forum

October 1, 1997 - September 30, 1998

NPDES #	REACH	NAME	CONCENTRATION	FLOW RATE	SALT LOAD	EXPLANATION
			MG/L	MGD	TONS/DAY	CODE
AZ0022560	900	BIA Keams Canyon		0.030	0.00	M-3*
AZ0110213	900	BIA Low Mountain Boarding School		0.014	0.00	M-3*
AZ0021610	900	Cameron Trading Post		0.054	0.00	M-3
AZ0023990	930	CAWCD - Havasu Pumping Plant		0.780	0.00	I-3
AZ0021024	920	Citizens Utilities/Riverbend WWTP	0	0.170	0.00	M-1
AZ0022462	940	Colorado River Indian Tribe WTP		0.040	0.00	M-3*
AZ0021415	940	Colorado River Joint Venture WWTP	75	1.200	0.38	M*
AZ0022098	940	Le Pera School - Parker S.D. #27	0	0.000	0.00	M-1
AZ0023647	920	Mohave Topock Compressor Station	1300	0.144	0.78	I
AZ0022195	900	NTUA/Ganado	400	0.400	0.67	M-6*
AZ0022471	801	NTUA/Kaibeto		0.100	0.00	M-3*
AZ0022802	900	NTUA/Rough Rock Lagoons		0.007	0.00	M-3*
AZ0020265	801	NTUA/Chinle	400	0.783	1.31	M-6*
AZ0024236	900	NTUA/Jeddito		0.037	0.00	M-3*
AZ0024228	900	NTUA/Pinon		0.030	0.00	M-3*
AZ0020281	801	NTUA/Kayenta	400	0.900	1.50	M-6*
AZ0021920	801	NTUA/Many Farms		0.070	0.00	M-6*
AZ0020290	900	NTUA/Tuba City	400	1.100	1.84	M-6*
AZ0021555	900	NTUA/Window Rock-Ft. Defiance	400	1.320	2.20	M-6*
AZ0022284	900	Parker, Town of WTP		0.013	0.00	M-3
AZ0022772	900	St. Johns, City of POTW		0.500	0.00	M-3
AZ0021474	900	Stone Forest Industries/Flagstaff	0	0.015	0.00	I-2
AZ0110248	920	USBR/Davis Dam WTP		0.027	0.00	M-3
AZ0110019	700	USBR/Glen Canyon CRSP	350	0.015	0.02	M
AZ0110329	910	USBR/Hoover Dam	150	0.055	0.03	M
AZ0000132	920	USFWS/Willow Beach Fish Hatchery	10	20.800	0.87	I-5D
AZ0110426	900	USNPS/Grand Canyon/North Rim		0.150	0.00	M-3
AZ0023621	900	USNPS/Grand Canyon/Garden Creek	100	0.450	0.19	M
AZ0022152	900	USNPS/Grand Canyon/South Rim		0.750	0.00	M-3
AZ0023523	920	USNPS/Katherine Landing WTP	100	0.200	0.08	M
AZ0023833	900	Winslow, City of POTW		2.200	0.00	M-3
CA0104205	920	NEEDLES, CITY OF	1231	0.960	4.93	M
CA7000005	940	USBR, PARKER DAM AND POWER PLANT DWF	45	0.003	0.00	M
COG584012	190	ALMONT WWTP	337	0.008	0.01	M
CO0042447	100	AMERICAN ATLAS #1, LTD, LLP	2853	0.093	1.11	I-5A
CO0026468	801	AMORELLI, JOE AND CHERYL	370	0.003	0.00	M
CO0026387	100	ASPEN CONSOLIDATED SAN DISTRICT	568	2.062	4.89	M
CO0044750	100	ASPEN GLEN WATER & SAN. DIST.	524	0.005	0.01	M
CO0022721	100	ASPEN VILLAGE HOMEOWNERS ASSN.	366	0.024	0.04	M
COG640066	100	ASPEN, CITY OF - WATER DEPT.	299	0.135	0.17	I
CO0021491	100	BASALT SANITATION DISTRICT	321	0.313	0.42	M
COG640078	100	BASALT, TOWN OF	50	0.100	0.02	I
COG584028	100	BATTLEMENT MESA METO. DIST.	755	0.336	1.06	M
CO0020273	801	BAYFIELD SANITATION DISTRICT	263	0.238	0.26	M
CO0039276	801	BAYFIELD SANITATION DISTRICT	410	0.017	0.03	M
CO0044377	220	BEAR COAL COMPANY	3538	0.032	0.47	I
CO0042111	801	BEAR, RUEDI	3234	0.253	3.41	I-5C
COG581011	801	BENSON, LARRY W & MABEL A.	320	0.008	0.01	M
CO0038024	510	BLUE MOUNTAIN ENERGY, INC.	722	0.017	0.05	I
CO0020826	100	BLUE RIVER WWTP	353	2.443	3.60	M
CO0033685	220	BOWIE RESOURCES LIMITED	610	0.011	0.03	I

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COG850039	220	BOWIE RESOURCES, LIMITED	1295	0.054	0.29	I
CO0021539	100	BRECKENRIDGE SAN DISTRICT	244	1.598	1.63	M
CO0029211	100	BRECKENRIDGE SAN DISTRICT	0	0.000	0.00	M-2
CO0027197	100	BRECKENRIDGE SANITATION DIST.	0	0.000	0.00	M-2
COG584003	100	CANYON CREEK ESTATE HOA	1143	0.013	0.06	M
COG640027	100	CARBONDALE, TOWN OF	84	0.196	0.07	I
CO0026751	100	CARBONDALE, TOWN OF	375	0.314	0.49	M
COG640015	220	CEDAREEDGE, TOWN OF	72	0.029	0.01	I
CO0031984	220	CEDAREEDGE, TOWN OF	320	0.193	0.26	M
CO0033260	300	CLIFTON SANITATION DISTRICT #1	614	0.041	0.11	M
CO0033791	300	CLIFTON SANITATION DISTRICT #2	590	0.777	1.92	M-5A
CO0035394	190	CLIMAX MOLYBDENUM CO.-KEYSTONE	793	0.415	1.37	I-5B
CO0000248	100	CLIMAX MOLYBDENUM COMPANY	1269	30.270	160.30	I-5B
CO0040487	100	COLLBRAN, TOWN OF	884	0.127	0.47	M
COG584032	100	COLO DEPARTMENT OF CORRECTIONS	432	0.025	0.05	M
CO0044091	100	COLO DIV OF WILDLIFE-WINDY	272	0.000	0.00	M-2
CO0042579	220	COLO DIV PARKS & OUTDOOR REC	395	0.005	0.01	M
COG130001	100	COLORADO DIVISION OF WILDLIFE	275	7.499	8.61	I-5D
COG130004	190	COLORADO DIVISION OF WILDLIFE	112	11.471	5.36	I-5D
COG130005	801	COLORADO DIVISION OF WILDLIFE	214	3.324	2.96	I-5D
COG130006	190	COLORADO DIVISION OF WILDLIFE	214	6.523	5.83	I-5D
COG130007	100	COLORADO DIVISION OF WILDLIFE	173	2.754	1.99	I-5D
COG130011	100	COLORADO DIVISION OF WILDLIFE	273	33.939	38.73	I-5D
COG500184	100	COLORADO YULE MARBLE COMPANY	155	0.024	0.02	I
COG850017	500	COLOWYO COAL COMPANY L.P.	630	0.232	0.61	I
COG500245	500	CONNELL RESOURCES, INC.	450	1.512	2.84	I-5B
CO0038440	100	CONRAD, JOHN J.	170	0.001	0.00	M
COG500155	300	CORN CONSTRUCTION COMPANY	5920	1.010	24.95	I-5E
CO0020125	801	CORTEZ SAN DIST - NORTH WWTF	791	0.219	0.72	M
CO0027880	801	CORTEZ SAN DIST - SOUTH WWTF	505	0.584	1.23	M
CO0027545	801	CORTEZ SAN DIST - SW WWTF	613	0.134	0.34	M
CO0036251	310	COTTER CORPORATION	2100	0.015	0.13	I
COG581002	100	COTTONWOOD SPRINGS MHP	1310	0.062	0.34	M
CO0043893	100	COVERED BRIDGE BUILDING LTD.	565	0.064	0.15	I
CO0040037	500	CRAIG, CITY OF - WWTP	767	1.278	4.09	M-5
CO0037729	220	CRAWFORD, TOWN OF	271	0.141	0.16	M
CO0031836	190	CRESTED BUTTE SOUTH METRO DIST	355	0.037	0.05	M
CO0034142	500	CYPRUS EMPIRE CORP. EAGLE MINE	310	0.592	0.77	I
CO0031445	801	DAVIS, JR., ROBERT H. DBA	480	0.003	0.01	M
CO0023418	100	DEBEQUE, TOWN OF	753	0.016	0.05	M
COG500209	220	DELTA SAND AND GRAVEL COMPANY	728	1.875	5.70	I-5E
CO0039641	220	DELTA, CITY OF	1242	0.912	4.73	M
COG640006	100	DILLON, TOWN OF - WTP	0	0.054	0.00	I-2
CO0040509	801	DOLORES, TOWN OF	485	0.157	0.32	M
CO0023434	310	DOVE CREEK, TOWN OF	863	0.040	0.14	M
COG500243	500	DUCKELS CONST. DBA YAMPA AGGREG	158	1.012	0.67	I
CO0023876	100	DUNDEE REALITY USA, INC.	609	0.008	0.02	M
CO0024082	801	DURANGO, CITY OF	357	1.910	2.84	M
CO0021369	100	EAGLE RIVER WATER & SAN. DIST.	386	1.834	2.95	M
CO0024431	100	EAGLE RIVER WATER & SAN. DIST.	348	1.953	2.84	M
CO0037311	100	EAGLE RIVER WATER & SAN. DIST.	662	0.739	2.04	M-5
CO0040266	801	EDGEMONT RANCH METRO DISTRICT	516	0.020	0.04	M
COG500210	300	ELAM CONSTRUCTION, INC.	832	2.395	8.32	I-5E

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CO0031551	801	ELLIS, JAMES M., III	555	0.007	0.02	M
COG500316	100	EVERIST, L.G., INC.	181	2.000	1.51	I-5E
CO0038270	100	EXXON COMPANY, USA	473	3.035	5.99	I-6
COG500114	100	FLAG SAND AND GRAVEL	577	0.040	0.10	I
CO0044067	310	FLEET RESOURCES, INC.	776	0.620	2.01	I-5A
COG584025	801	FOREST LAKES METRO DISTRICT	320	0.022	0.03	M
COG584030	801	FORREST GROVES ESTATES HOA INC	505	0.006	0.01	M
CO0040142	100	FRASER SANITATION DISTRICT	224	0.273	0.25	M
CO0020451	100	FRISCO SANITATION DISTRICT	415	0.541	0.94	M
COG640067	100	FRISCO, TOWN OF	57	0.016	0.00	I
COG583002	100	FRUITA, TOWN OF	1042	0.593	2.58	M-5A
COG640072	100	GATEWAY OF SNOWMASS MESA SUBD.	399	0.003	0.00	I
CO0020516	100	GLENWOOD SPRINGS, CITY OF	1020	0.870	3.70	M-5A
CO0020699	100	GRANBY SANITATION DISTRICT	240	0.441	0.44	M
CO0032964	100	GRAND COUNTY W&S DISTRICT #1	159	0.292	0.19	M
COG500161	300	GRAND JUNCTION PIPE & SUPPLY	2306	0.200	1.92	I-5E
COG500321	300	GRAND JUNCTION PIPE & SUPPLY	5783	0.140	3.38	I-5E
COG500326	300	GRAND JUNCTION PIPE&SUPPLY CO.	1414	0.193	1.14	I-5E
COG640004	220	GRAND JUNCTION, CITY OF - WTP	269	0.031	0.03	I
COG500252	100	GRANT BROS. CONSTRUCTION LLC	713	0.744	2.21	I-5E
CO0041530	220	GUNNISON, CITY OF	412	1.091	1.88	M
COG584001	100	GYPSSUM, TOWN OF - WWTF	501	0.244	0.51	M
COG850008	500	HAYDEN GULCH TERMINAL, INC.	534	0.013	0.03	I
CO0040959	500	HAYDEN, TOWN OF	525	0.403	0.88	M
COG584010	801	HERMOSA SANITATION DISTRICT	540	0.123	0.28	M
COG584002	801	HIGH COUNTRY LODGE	275	0.002	0.00	M
CO0022756	190	HOMESTAKE MINING COMPANY	819	0.654	2.24	I-5A
COG584026	801	HORNBAKER, REX	375	0.007	0.01	M
CO0024350	100	HOT SULPHUR SPRINGS, TOWN OF	136	0.035	0.02	M
COG640019	100	HOT SULPHUR SPRINGS, TOWN WTP	147	0.011	0.01	I
CO0044903	220	HOTCHKISS, TOWN OF	1097	0.200	0.92	M
COG584029	100	INGELHART, FRED B & FRED R.	439	0.009	0.02	M
CO0045217	190	IRWIN TEN, L.L.C.	380	0.003	0.01	M
COG584020	801	J & J WALLS & CO.	475	0.006	0.01	M
CO0034738	801	LAKE CAPOTE WASTEWATER FACILITY	0	0.000	0.00	M-2*
CO0040673	200	LAKE CITY, TOWN OF	304	0.072	0.09	M
COG584005	310	LAST DOLLAR PUD IMPRVMENTS ASSO	390	0.005	0.01	M
CO0020303	100	LAZY GLEN HOMEOWNER'S ASSN,INC	360	0.026	0.04	M
COG582023	801	LEE, RICHARD O.	362	0.010	0.02	M
COG582028	801	LOMA LINDA SANITATION DISTRICT	597	0.037	0.09	M
CO0021687	801	MANCOS, TOWN OF	331	0.105	0.15	M
CO0022781	510	MEEKER SANITATION DISTRICT	577	0.224	0.54	M
CO0040053	300	MESA CO./GRAND JUNCTION - CITY	951	7.674	30.46	M
COG583001	300	MESA WATER & SANITATION DIST.	639	0.019	0.05	M
COG584007	100	MID VALLEY METROPOLITAN DIST.	324	0.242	0.33	M
CO0000396	100	MID-CONTINENT RESOURCES, INC.	485	0.011	0.02	I
CO0029599	100	MINREC, INC.	1371	0.097	0.56	I
CO0038806	100	MOBILE HOME MANAGEMENT CORP.	620	0.029	0.07	M
CO0037621	500	MOFFAT COUNTY IMPROVEMT DIST.	496	0.012	0.02	M
CO0039624	220	MONTROSE, CITY OF	887	1.613	5.97	M
CO0022969	220	MORRISON CREEK METRO W&SD	375	0.041	0.06	M
CO0038776	220	MOUNTAIN COAL COMPANY, LLC	2619	0.863	9.43	I-5B
COG500310	801	MOUNTAIN GRAVEL & CONST. CO.	988	0.145	0.60	I

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CO0027171	190	MT. CRESTED BUTTE W&S DISTRICT	278	0.364	0.42	M
CO0024007	310	NATURITA, TOWN OF	595	0.023	0.06	M
CO0040479	100	NEW CASTLE, TOWN OF - WWTP	677	0.116	0.33	M
COG584031	190	NORTH ELK MEADOWS HOA	488	0.013	0.03	M
CO0032191	310	NORWOOD SANITATION DISTRICT	553	0.093	0.21	M
COG582002	310	NUCLA SANITATION DISTRICT	1156	0.110	0.53	M
COG640038	310	NUCLA, TOWN OF - WATER PLANT	155	0.077	0.05	I
COG640057	500	OAK CREEK, TOWN OF - WTP	68	0.045	0.01	I
CO0041106	500	OAK CREEK, TOWN OF - WWTP	408	0.261	0.44	M
CO0029947	100	OCCIDENTAL OIL SHALE, INC.	1299	0.011	0.06	I
CO0020907	220	OLATHE, TOWN OF	2068	0.295	2.55	M-5A
COG640016	220	ORCHARD CITY, TOWN OF - WTP	70	1.755	0.51	I
CO0028860	100	OURAY RANCH HOMEOWNERS ASSOC.	120	0.001	0.00	M
CO0043397	220	OURAY, CITY OF	749	0.199	0.62	M
CO0043222	220	OURAY, CITY OF - HOT SPGS POOL	1354	1.610	9.09	I-5C
CO0000132	220	OXBOW CARBON AND MINERALS, INC	2531	0.248	2.62	I-5B
CO0034193	300	PABCO	730	0.042	0.13	I
COG640022	801	PAGOSA AREA W&SD	36	0.011	0.00	I
CO0038032	801	PAGOSA AREA W&SD-HIGHLANDS WWT	548	0.143	0.33	M
CO0041343	801	PAGOSA AREA W&SD-STEVEN'S WTP	233	0.015	0.01	I
CO0031755	801	PAGOSA AREA W&SD-VISTA WWTF	439	0.531	0.97	M
CO0022845	801	PAGOSA SPRINGS SAN. DIST.	835	0.320	1.12	M
COG584004	300	PALISADE, TOWN OF - WWTF	432	0.233	0.42	I
COG584015	300	PANORAMA IMPROVEMENT DISTRICT	440	0.063	0.12	I
CO0021709	220	PAONIA, TOWN OF	1124	0.199	0.93	M
CO0032638	500	PITTSBURG & MIDWAY COAL MINING	0	0.000	0.00	I-2
CO0027146	300	POWDERHORN COAL COMPANY	1579	0.491	3.24	I-5B
CO0023485	300	POWDERHORN METRO DISTRICT NO 1	260	0.006	0.01	M
CO0000027	300	PUBLIC SERVICE CO-CAMEO STATN	526	36.852	80.89	I-5B
CO0000523	500	PUBLIC SERVICE CO-HAYDEN STATN	330	0.024	0.03	I
COG581010	801	PURGATORY METROPOLITAN DIST.	658	0.195	0.54	I
CO0028525	100	RANCH AT ROARING FORK HOA, INC	374	0.040	0.06	M
CO0026972	510	RANGELY, TOWN OF	520	0.151	0.33	M
CO0021385	100	RED CLIFF, TOWN OF	184	0.176	0.14	M
CO0023922	100	REDSTONE WATER & SAN DISTRICT	399	0.031	0.05	M
CO0029106	220	RIDGWAY, TOWN OF	413	0.068	0.12	M
COG584024	100	RIFLE, CITY OF	1091	0.620	2.82	M-5
CO0030970	100	RIFLE, CITY OF - SOUTH WWTF	800	0.074	0.25	M
COG584006	100	RIVERBEND SUBDIVISION WWTF	2081	0.009	0.08	M
CO0039705	500	ROUTT CO. FOR MILNER COMMUNITY	299	0.018	0.02	M
COG582020	500	ROUTT CO. FOR PHIPPSBURG COMM	495	0.020	0.04	M
CO0000051	500	SAMSON RESOURCES COMPANY	1852	1.095	8.46	I-5B
COG584013	801	SAN JUAN RIVER VILLAGE METRO	335	0.029	0.04	M
COG500312	500	SENECA COAL COMPANY	360	0.019	0.03	I
CO0000221	500	SENECA COAL COMPANY	2734	3.480	39.70	I-5B
CO0029181	100	SILT, TOWN OF	929	0.099	0.38	M
CO0020311	801	SILVERTON, TOWN OF	258	0.118	0.13	M
COG640008	801	SILVERTON, TOWN OF - WTP	0	0.004	0.00	I-2
CO0023086	100	SNOWMASS WATER & SAN DISTRICT	221	0.909	0.84	M
CO0031810	100	SOPRIS VILLAGE HOA, INC.	428	0.027	0.05	M
CO0041262	801	SOUTH DURANGO SANITATION DIST.	624	0.075	0.20	M
CO0022853	801	SOUTHERN UTE TRIBE	0	0.000	0.00	M*
COG584033	310	ST. BARNABAS CHURCH CAMPS, INC	460	0.001	0.00	M

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CO0032280	500	STEAMBOAT HEALTH & REC ASSOC.	740	0.008	0.03	I
COG600127	500	STEAMBOAT SPRINGS WATER	220	155.250	142.53	I-5E
CO0020834	500	STEAMBOAT SPRINGS, CITY OF	113	5.770	2.71	M
CO0029955	100	SUMMIT COUNTY BD OF COMMISS	380	0.546	0.87	M
CO0027529	801	SUNNYSIDE GOLD CORP-AMERICAN T	1390	1.695	9.83	I-5B
CO0044601	220	SUNSHINE MINING & REFINING CO.	188	0.800	0.63	I
CO0035815	100	TALBOTT ENTERPRISES, INC	1540	0.059	0.38	M-5
COG584021	310	TELECAM PARTNERSHIP II LIMITED	731	0.005	0.02	M-5
CO0041840	310	TELLURIDE, TOWN OF	386	0.691	1.11	M
COG640024	310	TELLURIDE, TOWN OF	125	0.014	0.01	I
CO0037681	100	THREE LAKES W&SD-WILLOW CREEK	204	0.443	0.38	M
CO0032115	500	TRAPPER MINING, INC.	1434	4.322	25.87	I-5B
COG500255	200	TRI COUNTY GRAVEL	1745	0.113	0.82	I
CO0000540	310	TRI-STATE GENERATN & TRANSMISSN	1498	0.177	1.10	I-5B
CO0042161	500	TWENTYMILE COAL COMPANY	6119	0.162	4.14	I-5B
COG500299	300	UNITED COMPANIES OF MESA CNTY	6881	0.205	5.89	I-5E
COG500216	300	UNITED COMPANIES OF MESA CNTY	4538	0.183	3.46	I-5E
COG500218	300	UNITED COMPANIES OF MESA CNTY	1700	0.185	1.31	I-5E
COG500329	190	UNITED COMPANIES OF MESA CNTY.	0	0.000	0.00	I-2
COG584011	801	UPPER VALLEY SANITATION, INC.	233	0.007	0.01	M
CO0034398	801	USDI-NPS MESA VERDE NATIONAL PARK	323	0.088	0.12	M*
CO0000086	220	USFWS HOTCHKISS NATIONAL FISH HATCHER	0	2.130	0.00	I*
COG640070	300	UTE WATER CONSERVANCY DISTRICT	129	0.660	0.36	I
CO0042480	100	VIACOM INTERNATIONAL, INC.	4469	0.471	8.78	I-5A
CO0042617	220	VOLUNTEERS OF AMERICA CARE FAC	474	0.008	0.02	M
COG584008	100	WEST GLENWOOD SPRINGS SAN DIST	331	0.206	0.28	M
CO0030449	220	WEST MONTROSE SANITATION DIST	822	0.233	0.80	M
CO0000213	310	WESTERN FUELS-COLORADO, A LLC	2575	0.790	8.49	I-5B
COG500088	100	WESTERN MOBILE NORTHERN, INC.	1056	0.465	2.05	I
COG500175	500	WESTERN MOBILE NORTHERN, INC.	189	0.285	0.22	I
COG500267	100	WESTERN MOBILE NORTHERN, INC.	597	1.113	2.77	I-5B
COG500001	500	WESTERN MOBILE NORTHERN, INC.	290	0.397	0.48	I
CO0031062	500	WHITEMAN SCHOOL	100	0.004	0.00	M
COG500123	220	WHITEWATER BUILDING MATERIALS	1960	0.040	0.33	I
COG500127	220	WHITEWATER BUILDING MATERIALS	1073	0.040	0.18	I
COG500062	500	WILLIAMS FORK COMPANY	1910	0.359	2.86	I-5B
CO0026051	100	WINTER PARK WATER & SAN DIST	194	0.154	0.12	M
NM0027995	801	ARCO MATERIALS INC.	—	0.341	0.00	I-3
NM0000019	801	ARIZONA PUBLIC SERVICE CO. - FOUR CORNE	742	8.500	26.32	I-5B
NM0020168	801	AZTEC WASTE WATER TREATMENT PLANT	650	0.680	1.84	M
NM0028142	801	BLOOMFIELD SCHOOLS WWTP	—	0.002	0.00	I-7
NM0020770	801	BLOOMFIELD WWTP	171	0.562	0.40	M
NM0029538	900	CARBON COAL (CARBON #2 MINE)	0	0.000	0.00	I-1
NM0029251	801	CARBON COAL (MENTMORE MINE)	0	0.000	0.00	I-1
NM0029319	801	CENTRAL CONS. SCHOOL DIST #22	704	0.036	0.11	I-6
NM0028584	801	CONSOLIDATION COAL CO.	0	0.000	0.00	I-2
NM0000043	801	FARMINGTON ANIMAS POWER PLANT		7.000	0.00	I-4
NM0000051	801	FARMINGTON DRINKING WATER PLANT	0	0.000	0.00	I-2
NM0029572	801	FARMINGTON MUNICIPAL OPERATIONS CENTE	0	0.000	0.00	I-5E
NM0028258	801	FARMINGTON SAND AND GRAVEL		0.000	0.00	I-4
NM0020583	801	FARMINGTON WWTP	760	4.810	15.25	M-6
NM0020672	900	GALLUP WWTP	1082	2.700	12.19	M-6

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NM0029025	801	HARPER VALLEY SUBD.	—	0.016	0.00	I-4
NM0020630	900	NTUA CROWNPOINT WWTP	N/A	0.000	0.00	M*
NM0020613	900	NTUA NAVAJO WWTP	N/A	0.000	0.00	M-1*
NM0020621	801	NTUA SHIPROCK WWTP	N/A	0.000	0.00	M-1*
NM0020605	801	NTUA TOHATCHI WWTP	N/A	0.000	0.00	M-1*
NM0029408	900	PONDEROSA PRODUCTS, INC.	N/A	0.000	0.00	I-2*
NM0028606	801	PUBLIC SERVICE CO OF NM - SAN JUAN	0	0.000	0.00	I-2
NM0020524	900	QUIVIRA MINING COMPANY - CHURCH ROCK	0	0.000	0.00	I-2
NM0023396	900	RAMAH WWTP	0	0.000	0.00	M-7
NM0029505	801	SAN JUAN COAL COMPANY	0	0.000	0.00	I-2
NM0028746	801	SAN JUAN COAL COMPANY (SAN JUAN MINE)	0	0.000	0.00	I-2
NM0000027	801	SAN JUAN CONCRETE COMPANY	0	0.000	0.00	I-3
NM0028550	900	UNITED NUCLEAR CORPORATION CHURCH RO	0	0.000	0.00	I-2
NM0020401	900	UNITED NUCLEAR CORPORATION NE CHURCH	0	0.000	0.00	I-2
NM0020869	801	USDIBIA, CRYSTAL BOARDING SCHOOL	N/A	0.000	0.00	M*
NM0026751	801	USDIBIA, JICARILLA WWTP	N/A	0.000	0.00	M-1*
NM0021016	801	USDIBIA, LAKE VALLEY BOARDING SCHOOL	N/A	0.000	0.00	M-2*
NM0020800	801	USDIBIA, NENAHNEZAD BOARDING SCHOOL	N/A	0.000	0.00	M-6*
NM0020991	801	USDIBIA, PUEBLO PINTADO BOARDING SCHOC	N/A	0.000	0.00	M-1*
NM0020982	801	USDIBIA, STANDING ROCK BOARDING SCHOOL	N/A	0.000	0.00	M-2*
NM0020958	900	USDIBIA, WINGATE BOARDING SCHOOL	N/A	0.000	0.00	M-2*
NM0028193	801	UTAH INTERNATIONAL INC. - NAVAJO MINE	0	0.000	0.00	I-2*
NM0027774	900	WHITE CLIFFS MHP	—	.	0.00	I-1
NM0029432	801	YAMPA MINING CO. (DE-NA-ZIN MINE)	0	0.000	0.00	I-2
NM0029475	801	YAMPA MINING CO. (GATEWAY MINE)	0	0.000	0.00	I-2
NV0022471	910	CC School - R.C. White Trans.	725	0.007	0.02	I
NV0021261	910	CCSD AWT Plant 1	1265	66.680	351.99	M-5A
NV0021563	920	CCSD-Laughlin	1043	2.660	11.58	M-5A
NV0022837	910	Circle K Stores Inc		0.001	0.00	I-5E
NV0022730	910	D&G Oil		0.001	0.00	I-5E
NV0022721	910	Exxon # 7-3868			0.00	I-5E
NV0022845	910	Harrah's Las Vegas	1305	0.001	0.01	I
NV0022098	910	Henderson WRF	1225	7.439	38.03	M-5A
NV0021750	910	Hilton Hotel & Casino	2891	0.075	0.90	I-5E
NV0000078	910	Kerr McGee (001a)	302	0.026	0.03	I
NV0000078	910	Kerr McGee (001b)	229	0.026	0.02	I
NV0000078	910	Kerr McGee (002a)	379	0.026	0.04	I
NV0000078	910	Kerr McGee (002b)	229	0.026	0.02	I
NV0000078	910	Kerr McGee (003)	0	0.000	0.00	I-2
NV0022691	910	Lake Las Vegas	1767	12.700	93.65	I
NV0020133	910	Las Vegas WWTP	1200	52.600	263.40	M-5A
NV0022748	910	Las Vegas, City of (Bonneville)	1242	0.018	0.09	I-5E
NV0021950	910	LV-Municipal Storm Drain Syst	2778	20.400	236.49	
NV0022641	910	Marnell Corrao for Bellagio	0	0.000	0.00	I-2
NV0022250	910	Montgomery Ward	4180	0.020	0.35	I-5E
NV0020192	910	NDOW - Lake Mead	610	4.883	12.43	I-5D
NV0020923	910	Pioneer Chlor Alkali #7	0	0.000	0.00	I-2
NV0022446	910	Rebel Oil Company	0	0.000	0.00	I-2
NV0022896	910	Red Rock Mini Mart	0	0.000	0.00	I-2
NV0022772	910	Saxton			0.00	I-7
NV0022594	910	SECOR/7-eleven # 13702	1935	0.001	0.01	I-5E
NV0022608	910	SECOR/7-eleven # 29643	8180	0.003	0.09	I-5E

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NPDES #	REACH	NAME	CONCENTRATION	FLOW RATE	SALT LOAD	EXPLANATION
			MGL	MGD	TONS/DAY	CODE
NV0022802	910	Southland Corp - # 20084	1620	0.001	0.01	I-5E
NV0022829	910	Southland Corp - # 20687	2911	0.001	0.01	I-5E
NV0022811	910	Southland Corp - # 29644	2625	0.007	0.08	I-5E
NV0022870	910	Southland Corp - #19653	4040	0.002	0.03	I-5E
NV0021679	910	Stallion Mountain Country Club	5523	0.370	8.53	I-5B/E
NV0000060	910	Titanium Metals (TIMET)	521	4.630	10.07	I
NV0022781	910	Tomiyasu Basement Dewatering	3795	0.051	0.81	I-5E
NV0022420	910	Union Oil Company	407	0.000	0.00	I-5E
NV0021865	910	US NPS - Callville Bay	574	0.023	0.06	M
NV0021873	910	US NPS - Echo Bay WTP	545	0.010	0.02	M
NV0021881	910	US NPS - Las Vegas Bay WTP	576	0.006	0.01	M
NV0021890	910	US NPS - Overton Beach	559	0.017	0.04	M
NV0022543	910	USA #100	2987	0.001	0.01	I-5E
NV0022195	910	Valley Hospital	2230	0.038	0.35	I-5E
NV0022888	910	Venetian,The	2315	0.017	0.16	I-5E
UT0021091	610	ALTAMONT, CITY OF	0	0.000	0.00	M-1
UTG040012	600	AMAX COAL COMPANY	0	0.000	0.00	I
UT0000167	510	AMERICAN GILSONITE CO	1900	0.500	3.96	I-5E
UT0024112	600	AMOCO MINERALS CO - SUNNYSIDE TRIAL	0	0.000	0.00	I-1
UT0025267	600	ANADARKO	0	0.000	0.00	I-1
UTG040017	700	ANDALEX - IRON SPRING	0	0.000	0.00	I-1
UTG040008	600	ANDALEX - PINNACLE COAL MINE	1139	0.000	0.00	I-2
UTG040018	700	ANDALEX - SMOKY HOLLOW	0	0.000	0.00	I-1
UTG040007	600	ANDALEX WILDCAT LOADOUT	0	0.000	0.00	I-2
UT0024180	610	ASAMERA OIL - HANSEN #1	0	0.000	0.00	I-1
UT0024511	411	ASHLEY VALLEY SEWER BOARD	1221	1.280	6.52	M-5A
UTG640003	411	ASHLEY VALLEY WATER & SEWER IDWTP	0	0.000	0.00	M-1
UT0023906	710	ATLAS MINERALS SNOW PROBE MINE	0	0.000	0.00	I-1
UT0025003	411	B&R OIL	0	0.000	0.00	I-2
UTG040002	710	BHP - KNIGHT COAL MINE	0	0.000	0.00	I-1
UT0024139	300	BIG HORN OIL, INC.	0	0.000	0.00	I-1
UT0023086	600	BLACKHAWK COAL	0	0.000	0.00	I-1
UTG640019	802	BLANDING CULINARY WATER TREATMENT	0	0.000	0.00	M-6
UT0023647	600	BLAZON NO 1 MINE	0	0.000	0.00	I-1
UT0020451	510	BONANZA, CITY OF	0	0.000	0.00	M-1
UT0023761	600	C & W MINE # 1	0	0.000	0.00	I-1
UTG040020	600	CANYON FUEL - DUGOUT	0	0.000	0.00	I
UT0023540	600	CANYON FUEL - SKYLINE	950	0.810	3.21	I-5E
UT0022918	700	CANYON FUEL - SUFCO	650	2.500	6.78	I-5E
UT0023663	710	CASTLE VALLEY SPECIAL SERVICE-CASTLEDA	1200	0.140	0.70	M-4
UT0022489	700	CHAPPELL'S CHEESE COMPANY	0	0.000	0.00	I-1
UTG790004	600	CHEVRON STATION - GREEN RIVER	0	0.000	0.00	I-1
UT0022411	600	CLEAR CREEK UTILITIES, INC.	0	0.000	0.00	M-1
UTG040006	710	CO-OP MINING COMPANY	360	0.222	0.33	I
UT0000124	411	COLT RESOURCES	1400	1.350	7.89	I-5E
UT0024040	700	CONSOLIDATED COAL - EMERY PLANT	0	0.000	0.00	I-1
UT0022616	700	CONSOLIDATED COAL CO-UNDERGROUND	2800	0.640	7.48	I-5E
UT0022624	700	CONSOLIDATED COAL CO. - SURFACE MINE	0	0.000	0.00	I-1
UTG040016	600	CYPRES BLACKHAWK	0	0.000	0.00	I
UT0023736	600	CYPRUS PLATEAU MINING COMPANY	0	0.000	0.00	I-2
UT0020095	610	DUCHESNE CITY CORP	0	0.000	0.00	M-2
UTG640014	411	DUTCH JOHN	0	0.000	0.00	M-1

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			MGL	MGD	TONS/DAY	CODE
UTG640012	600	E CARBON CITY - SUNNYSIDE CWTP	0	0.000	0.00	M-1
UT0000035	411	EQUITY OIL CO	1130	1.200	5.66	I-5E
UT0020052	710	FERRON, CITY OF	1550	0.130	0.84	M-4
UT0023876	600	FIRST WESTERN COAL CO- ALETHA #1	0	0.000	0.00	I-1
UTG040010	600	GENWAL - (WELLINGTON)	0	0.000	0.00	I-2
UT0024368	710	GENWAL RESOURCES, INC-CRANDALL	450	0.577	1.08	I-5E
UT0000787	600	GREEN RIVER, CITY OF	0	0.000	0.00	M-1
UT0020958	600	GREEN RIVER, CITY OF	0	0.000	0.00	M-1
UT0022748	600	HIAWATHA	0	0.000	0.00	M-1
UT0021792	411	HOLLANDSWORTH & TRAVIS	2000	0.150	1.25	I-5E
UTG040019	600	HORIZON COAL	400	0.034	0.06	I
UT0021296	710	HUNTINGTON, CITY OF	3400	0.070	0.99	M
UT0024015	411	INTERMOUNTAIN CONCRETE	0	0.000	0.00	I
UT0023922	300	INTERNATIONAL URANIUM RIM MINE	0	0.000	0.00	I-2
UT0024929	900	INTERSTATE ROCK PRODUCT	0	0.000	0.00	I-1
UTG040013	600	IPA HORSE CANYON	0	0.000	0.00	I-2
UT0020401	900	KANAB CITY CORP	0	0.000	0.00	M-1
UTG070037		KERN RIVER GAS PIPELINE	0	0.000	0.00	I-1
UTG130013	700	LONESOME CEDAR TROUT FARM	0	0.000	0.00	I-1
UT0020443	411	MANILA, TOWN OF	0	0.000	0.00	M-1
UT0023396	300	MINERALS EVALUATION & INVEST	0	0.000	0.00	I-1
UT0024945	802	MK - FERGUSON (MEXICAN HAT UMTRA)	0	0.000	0.00	I-2*
UT0024694	600	MK - FERGUSON CO (GREEN RIVER UMTRA)	0	0.000	0.00	I-1
UTG079001	300	MOAB INTERIM REMEDIAL	0	0.000	0.00	I-1
UT0023108	300	MOAB READY-MIX CO	0	0.000	0.00	I-1
UTG640007	300	MOAB SALT WTP	0	0.000	0.00	I-1
UT0020419	300	MOAB, CITY OF	530	1.000	2.21	M
UT0024503	802	MONTICELLO	0	0.000	0.00	M-2
UTG640015	802	MONTICELLO CITY (CULINARY WATER TREATM	0	0.000	0.00	M-6
UTG040014	600	MOUNTAIN COAL CO. - GORDON 3 & 6	0	0.000	0.00	I-1
UTG040004	600	MOUNTAIN COAL CO. - GORDON CREEK	0	0.000	0.00	I-2
UTG040015	710	MOUNTAIN COAL CO. - HUNTINGTON	0	0.000	0.00	I-1
UTG040005	600	MOUNTAIN COAL CO. C-VSPUR	0	0.000	0.00	I-2
UTG070025		MOUNTAIN FUEL PIPELINE	0	0.000	0.00	I-1
UT0020133	802	MOUNTAIN STATES PETROLEUM	1000	0.030	0.13	I*
UTG640008	610	MYTON CITY WTP	0	0.000	0.00	M-1
UT0023001	610	NEOLA TOWN WATER & SEWER ASSOC.	0	0.000	0.00	M-2
UT0024287	610	NORTH FORK SIPHON - SUCCESSFUL BIDDER	0	0.000	0.00	I-1
UT0000094	600	PACIFIC CORP (CARBON)	2260	0.344	3.24	I-5B
UT0023426	710	PACIFIC CORP (HUNTER)	0	0.000	0.00	I-1
UT0023604	710	PACIFICORP (DEER CREEK)	728	1.820	5.53	I-5E
UT0023591	710	PACIFICORP (DES BEE DOVE MINE)	0	0.000	0.00	I-2
UTG040009	710	PACIFICORP (HUNTER COAL PREP)	0	0.000	0.00	I-2
UT0022896	710	PACIFICORP (WILBERG MINE)	1100	0.230	1.06	I-5E
UTG040003	710	PACIFICORP - (TRAIL MOUNTAIN)	1560	0.274	1.78	I-5E
UT0024163	510	PARAHO-UTE OIL SHALE FACILITY	0	0.000	0.00	I-1
UT0022527	610	PENNZOIL	0	0.000	0.00	I-2
UTG070036	600	PG&E RESOURCES	0	0.000	0.00	I-1
UT0024341	600	PLEASANT VALLEY COAL - KINNEY #2	0	0.000	0.00	I-1
UT0024589	600	PRICE CITY WTP	0	0.000	0.00	M-2
UT0021814	600	PRICE RIVER WATER IMP DIST	1073	2.000	8.96	M
UT0024635	600	PRICE RIVER WTP	0	0.000	0.00	M-6
UT0024295	710	RILDA CANYON MINE - WEST APPA	0	0.000	0.00	I-1

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			MGL	MGD	TONS/DAY	CODE
UT0000311	802	RIO ALGOM CORP - LISBON MINE	0	0.000	0.00	I-1
UTG130016	700	ROAD CREEK TROUT	170	4.600	3.26	I-5D
UT0000230	411	S.F. PHOSPHATES LTD	0	0.000	0.00	I-1
UT0024228	510	SEEP RIDGE SHALE OIL COMPANY	0	0.000	0.00	I-1
UT0023680	600	SOLDIER CREEK COAL CO	980	0.400	1.64	I-5E
UT0023701	710	SOLDIER CREEK COAL CO HIDDEN VALLEY	0	0.000	0.00	I-1
UTG040011	600	SOLDIER CREEK COAL COMPANY	0	0.000	0.00	I-2
UT0025224	905	SPRINGDALE	634	0.000	0.00	M
UT0021776	905	ST GEORGE, CITY OF	1248	7.000	36.46	M
UT0024031	600	SUNCO ENERGY DEVELOPMENT CO	0	0.000	0.00	I-1
UT0022942	600	SUNNYSIDE COAL CO	0	0.000	0.00	I-2
UT0024759	600	SUNNYSIDE COGENERATION ASSOCIATES	586	0.000	0.00	I-2
UT0000761	300	TEXASGULF, INCORPORATED, MOAB POTASH	0	0.000	0.00	I-1
UT0024104	510	TOSCO DEVELOPMENT CORP - SAND WASH PI	0	0.000	0.00	I-1
UTG640002	610	TRIDELL - LAPOINT WATER (IDWTP)	0	0.000	0.00	M-2
UT0023370	900	TROPIC TOWN	0	0.000	0.00	M-1
UT0024171	411	TXO PROD CORP - ASPHALT CREEK FED 1	0	0.000	0.00	I-1
UT0023841	610	TYGER CONSTRUCTION CO, INC-UPPER STILL	0	0.000	0.00	I-1
UT0023931	600	UCO, INC - SCOFIELD MINE	0	0.000	0.00	I-1
UT0023990	600	UCO, INCORPORATED	0	0.000	0.00	I-1
UT0023787	411	UNDERGROUND CONSTRUCT CO-TYZACK PUM	0	0.000	0.00	I-1
UT0023094	600	UNITED STATES FUEL CO	1300	1.000	5.42	I-5E
UT0021768	411	UNITED UTILITIES	1360	0.487	2.76	I-5E
UT0023914	300	US ENERGY VELVET MINE	730	0.000	0.00	I-2
UTG640006	700	US NATIONAL PARK (CAPITOL REEF WTP)	0	0.000	0.00	M-1
UTG640004	700	US NATIONAL PARK (GLEN CANYON WTP)	0	0.000	0.00	M-1
UT0021121	411	USBOR - DUTCH JOHN COMMUNITY	0	0.000	0.00	I-1
UT0020338	411	USBOR - FLAMING GORGE DAM	800	0.000	0.00	M
UT0024252	610	USBOR - SOLDIER CREEK DAM	0	0.000	0.00	I-1
UT0023035	610	USBOR - STILLWATER	0	0.000	0.00	I-1
UT0024023	610	USBOR UPPER STILLWATER DAM/TUN	0	0.000	0.00	I-1
UTG130001	411	USFWS - JONES HOLE NFH	174	13.000	9.44	I-5D
UTG130003	700	UTAH DIV OF WILDLIFE - J PERRY EAGON	182	12.800	9.72	I-5D
UTG130007	700	UTAH DIV OF WILDLIFE - LOA	168	8.900	6.24	I-5D
UTG130012	610	UTAH DIV OF WILDLIFE - WHITEROCK	275	4.500	5.16	I-5D
UTG640005	905	VIRGIN WTP	0	0.000	0.00	M-1
UT0023515	710	WESTERN STATES MINERALS CORP	0	0.000	0.00	I-1
UTG040021	600	WHITE OAK	639	0.015	0.04	I
UT0024121	610	WHITE RIVER DAM - SUCCESSFUL BIDDER	0	0.000	0.00	I-1
UT0024261	510	WHITE RIVER SHALE OIL CORP	0	0.000	0.00	I-1
UT0023868	510	ZIEGLER CHEMICAL	1600	0.100	0.67	I-5E
WY0033448	411	AMOCO PRODUCTION COMPANY	0	0.000	0.00	I-2
WY0022888	500	TOWN OF BAGGS	0	0.000	0.00	M-3
WY0020133	724	TOWN OF BIG PINEY	0	0.000	0.00	M-3
WY0028886	401	BLACK BUTTE COAL COMPANY	0	0.000	0.00	I-3
WY0030261	401	BLACK BUTTE COAL COMPANY	0	0.000	0.00	I-3
WY0030350	401	BRIDGER COAL COMPANY	0	0.000	0.00	I-3
WY0036153	411	BURNS BROTHERS INC	0	0.000	0.00	M-2
WY0035114	401	CELSIUS ENERGY COMPANY	0	0.000	0.00	I-2
WY0035882	401	CELSIUS ENERGY COMPANY	0	0.000	0.00	I-2
WY0035891	401	CELSIUS ENERGY COMPANY	0	0.000	0.00	I-2
WY0035904	401	CELSIUS ENERGY COMPANY	0	0.000	0.00	I-2

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			MG/L	MGD	TONS/DAY	CODE
WY0035912	401	CELSIUS ENERGY COMPANY	0	0.000	0.00	I-2
WY0035921	401	CELSIUS ENERGY COMPANY	0	0.000	0.00	I-2
WY0035939	401	CELSIUS ENERGY COMPANY	0	0.000	0.00	I-2
WY0035947	401	CELSIUS ENERGY COMPANY	0	0.000	0.00	I-2
WY0036099	401	CELSIUS ENERGY COMPANY	0	0.000	0.00	I-2
WY0036129	401	CELSIUS ENERGY COMPANY	0	0.000	0.00	I-2
WY0036137	401	CELSIUS ENERGY COMPANY	0	0.000	0.00	I-2
WY0036145	401	CELSIUS ENERGY COMPANY	0	0.000	0.00	I-2
WY0032697	411	CHEVRON U.S.A. PRODUCTION CO	0	0.000	0.00	I-2
WY0023132	411	CHURCH AND DWIGHT CO INC	0	0.000	0.00	I-6
WY0020443	401	CITY OF GREEN RIVER	725	0.827	2.50	M
WY0032727	401	COLORADO INTERSTATE GAS CO	0	0.000	0.00	M-3
WY0024546	500	CONTINENTAL INDUSTRIES, LC	0	0.000	0.00	I-3
WY0023124	401	DANIELS MOBILE HOME PARK	0	0.000	0.00	M-2
WY0036021	500	TOWN OF DIXON	0	0.000	0.00	I-3
WY0036803	401	ELLSWORTH PECK	0	0.000	0.00	I-2
WY0032450	401	EXXON COMPANY U S A	0	0.000	0.00	I-2
WY0032689	401	EXXON COMPANY U S A	0	0.000	0.00	I-3
WY0032701	401	EXXON COMPANY U S A	0	0.000	0.00	I-2
WY0031763	401	F M C CORPORATION	3876	0.072	1.16	I-5A
WY0022071	411	FORT BRIDGER SEWER DISTRICT	0	0.000	0.00	M-3
WY0000027	401	GREEN RIVER/ROCK SPRINGS JPWB	0	0.000	0.00	I-3
WY0035858	401	K C S MOUNTAIN RESOURCES INC	2428	0.086	0.88	I-3
WY0020320	411	KEMMERER-DIAMONDVILLE JPB	889	0.460	1.71	M-3
WY0000116	411	KEMMERER-DIAMONDVILLE JPB	0	0.000	0.00	I-3
WY0020117	411	TOWN OF LYMAN	0	0.000	0.00	M-3
WY0020311	411	PACIFICORP	1008	2.440	10.26	I-5B
WY0000051	411	PITTSBURG AND MIDWAY COAL CO	0	0.000	0.00	I-3
WY0022128	704	REGENCY OF WYOMING, INC.	0	0.000	0.00	M-3
WY0023825	401	ROCK SPRINGS ROYALTY COMPANY	0	0.000	0.00	I-3
WY0022357	401	CITY OF ROCK SPRINGS	757	2.320	7.33	M-5
WY0033111	411	SF PIPELINE LIMITED COMPANY	668	0.010	0.03	I
WY0026671	401	SUMMIT LODGING, WY LLC	0	0.000	0.00	M-3
WY0027626	411	PITTSBURG AND MIDWAY COAL CO	2044	0.172	1.47	I-3
WY0021938	500	TOWN OF DIXON	400	0.028	0.05	M
WY0022373	411	TOWN OF GRANGER	0	0.000	0.00	M-2
WY0022080	411	TOWN OF LABARGE	0	0.000	0.00	M-3
WY0021997	401	TOWN OF MARBLETON	0	0.000	0.00	M-3
WY0022896	411	TOWN OF MOUNTAIN VIEW	0	0.000	0.00	M-3
WY0020656	401	TOWN OF PINEDALE	136	0.671	0.38	M
WY0021806	401	TOWN OF SUPERIOR	0	0.000	0.00	M-2
WY0000086	401	WYO. GAME AND FISH DEPT.	302	2.600	3.28	I-4
WY0000094	401	WYO. GAME AND FISH DEPT.	80	1.350	0.45	I-4

**SUPPLEMENT TO
1999 REVIEW**

**SUPPLEMENTAL REPORT ON THE 1999 REVIEW
WATER QUALITY STANDARDS FOR SALINITY
COLORADO RIVER SYSTEM**

October 1999

**Supplemental Report
on the**

1999 REVIEW

**WATER QUALITY STANDARDS FOR SALINITY
COLORADO RIVER SYSTEM**

October 1999

Prepared by
Colorado River Basin Salinity Control Forum

COLORADO RIVER BASIN SALINITY CONTROL FORUM
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FORUM

Jack A. Barnett, Executive Director
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TRANSMITTAL LETTERS

Section 303 of the Clean Water Act requires that at least once every three years the states of the Colorado River Basin review water quality standards relating to the salinity of the waters of the Colorado River. The states collectively initiate this review under the auspices of the Colorado River Basin Salinity Control Forum and prepare a report and, after holding public meetings, prepare a supplemental report.

Upon the Forum's adoption of these two reports, they are transmitted to the individual states for their own independent action. The following is an example copy of the transmittal letter to the Governor of the State of Arizona. Following this letter is a listing of the Governors in each of the other six Colorado River Basin states who will receive identical letters.

December 3, 1999

Honorable Jane Dee Hull
Governor of Arizona
Statehouse
Phoenix, AZ 85007

Dear Governor Hull:

Enclosed is a copy of the Report on the 1999 Review, Water Quality Standards for Salinity, Colorado River System, approved on May 27, 1999 by the seven-state Colorado River Basin Salinity Control Forum.

Subsequent to the May approval, two regional public meetings were held to provide an opportunity for those who desired to present comments or suggestions on the report. The meetings were held on August 23, 1999 in Los Angeles, California, and on August 24, 1999 in Lyman, Wyoming.

Also enclosed is a copy of the Forum's Supplemental Report which includes modifications to the June report based on comments and suggestions received. The supplement was approved by the Forum on October 27, 1999. The June report and the October supplement constitute the 1999 Review of the water quality standards for salinity of the Colorado River system.

Section 303(c)(1) of the Clean Water Act requires:

The Governor of a State or the State water pollution control agency of such State shall from time to time (but at least once each three-year period beginning with the date of enactment of the Federal Water Pollution Control Act Amendments of 1972) hold public hearings for the purpose of reviewing applicable water quality standards and, as appropriate, modifying and adopting standards. Results of such review shall be available to the Administrator.

The enclosed report and supplement recommend no change in the numeric criteria for salinity, but reflect changes in the plan of implementation previously adopted by the Forum. The Forum urges that each state's water quality control agency adopt the 1999 Review as appropriate, thus preserving the basinwide approach to salinity control developed by the Basin states over the last 24 years. The Forum urges your state to take prompt action in adopting this review.

Sincerely,

Gordon W. Fassett
Chairman

enclosure

cc: Arizona Forum Members

Identical transmittal letters to be sent to each of the following:

Honorable Gray Davis
Governor of California
State Capitol
Sacramento, CA 95814

Honorable Bill F. Owens
Governor of Colorado
State Capitol
Denver, CO 80203

Honorable Kenny Guinn
Governor of Nevada
State Capitol
Carson City, NV 89701

Honorable Gary Johnson
Governor of New Mexico
State Capitol
Santa Fe, NM 87503

Honorable Mike Leavitt
Governor of Utah
State Capitol
Salt Lake City, UT 84114

Honorable Jim Geringer
Governor of Wyoming
State Capitol
Cheyenne, WY 82002

INTRODUCTION

The Supplemental Report on the 1999 Review, Water Quality Standards for Salinity, Colorado River System, contains statements and comments received by the Forum and the Forum's responses. Statements and comments were received at public meetings held in Los Angeles, California on August 23, 1999 and in Lyman, Wyoming on August 24, 1999. Written comments received by August 20, 1999 were also accepted. This supplement also includes the correction of typographical errors or deletions. All written comments or statements received by August 20 are included as a part of this supplemental report. All oral comments received at the public meetings were considered. It was determined that nearly all comments given orally that were related to the 1999 Review were supportive of the Review and the general thrust of the comments was represented by written statements of others. Thus, these oral comments will not be repeated in this supplemental report. However, one oral comment was received stating that the numeric criteria should be reviewed to determine whether the criteria should be lowered and a response to this oral statement is included in the Forum Response section of this report.

STATEMENTS, COMMENTS, AND FORUM RESPONSES

Overview of Public Meeting

At the two public meetings and through correspondence, the Forum received advice and comment from a number of organizations. Some provided written comment, some oral comment and some gave both oral and written comments. Those providing written comment are listed below and their written comment is included in this supplemental report.

Bryner Hansen Ditch Co.
California Regional Water Quality Control Board, Colorado River Basin Region
Carbon County Commission
Carbon-Emery Work Group
Eden Valley Irrigation & Drainage District
Ferron Canal & Reservoir Company
Los Angeles Water and Power Associates, Inc.
Metropolitan Water District of Southern California
Moore Group
Price River Soil Conservation District
Price Wellington Control Board
San Diego County Water Authority, General Manager
San Diego County Water Authority, Director
San Rafael Soil Conservation District
Stowell Mutual Canal Company
Uintah County Soil Conservation District
Upper Colorado River Commission
U.S. Department of Agriculture
Utah Division of Water Quality
Utah Division of Water Resources
WaterReuse Association of California
Wyoming State Engineer's Office

The meetings were well attended, most important and, for the most part, supportive testimony was received. The first meeting was held in Los Angeles on August 23. There were 32 in attendance and several attending represented large organizations responsible for delivering water to millions of people primarily in the Southern California coastal plain. Testimony was given by representatives of the Department of the Interior and the Department of Agriculture supporting the 1999 Review. Also, the Upper Colorado River Commission supported, on behalf of the four Upper Basin States, the Review. In total, there were 14 oral testimonies given.

The second meeting was held in Lyman, Wyoming on August 24. There were 71 in attendance. Several people came to learn more about the salinity control program and some rose to express their views concerning a possible salinity control effort in the Bridger Valley of Wyoming and Utah. Those that addressed the 1999 Review were supportive of the report. There were 13 oral testimonies given.

From all of the testimonies given, there were four issues that the Forum believes should be addressed in this supplemental report. The issues are: 1) salinity control program implementation needs to be accelerated; 2) salinity control in the Big Sandy Unit has not been accomplished as projected; 3) salinity and selenium control efforts should be advanced jointly as a part of the program's plan; and 4) the numeric criteria should be reviewed to determine whether the criteria should be lowered. The following is the Forum response to each of these issues.

Forum Response

Acceleration of the Program

Many comments were received that stated support of the program outlined in the 1999 Review. Several also commented that the implementation of the program should be accelerated. The Forum agrees. Three years ago, while conducting the 1996 Review, the Forum found that the rate of implementation of the program had fallen behind the rate of needed implementation which had been projected in 1993. In 1999, the Forum again finds this to be true. The greatest lack of the needed level of support is in the U.S. Department of Agriculture (USDA) program, while the U.S. Bureau of Reclamation (Reclamation) program comes closer to the needed level and the U.S. Bureau of Land Management (BLM) program cost effectiveness will be judged in the near future as it implements a separate cost code for salinity control. The Basin states' cost sharing dollars are available to match the needed federal appropriation and local water users stand ready with their cost sharing funds for projects requiring local cost sharing. The Forum will continue to review the BLM program to ensure that BLM funding expended to control salinity is obtaining cost effective results.

On page 2-9 of the 1999 Review, the Forum found that there is a shortfall of 384,000 tons of salt control which was to have been in place by 1998. The Forum went on to find that the shortfall "should be eliminated as soon as possible and at least within the next six years." The Review states that 87,000 tons/year should be controlled through 2005, with 64,000 tons/year of this control addressing elimination of the shortfall. On page 4-2 of the Review, the Forum found that to fund this accelerated program, there needs to be appropriated each year \$17.5 million for Reclamation, \$12 million for USDA and \$5.2 million for BLM.

On page 1-5 of the Review, the actual funding is reported. Historic federal funding levels are also shown graphically in Figure 1-2 on that same page. The Forum has consistently found the need for a funding level of \$17.5 million for Reclamation's program and \$12 million for the USDA program over the last several years and has reported this need to the Administration and to Congress. In 1999, Congress only appropriated \$12 million to Reclamation and the USDA Environmental Quality Incentives Program (EQIP) administrators only allocated \$5.1 million to the program.

Salinity Control in the Big Sandy Unit

Mr. Gary Zakotnik provided testimony in behalf of the Eden Valley Irrigation & Drainage District. Mr. Zakotnik contended that as USDA has proceeded with its Big Sandy "Project," that from 1989 until 1997 there has been an increase in tons of salt coming from the project. He quoted from the Draft Environmental Assessment (EA) for the Big Sandy Rock Sills Project dated March 1999 and prepared by Reclamation. It appears that Mr. Zakotnik has confused the USDA "project" with other projects. He correctly points out that the EA states that salinity contributions have increased since the construction of the project, however the EA does not refer to the salinity control project. The project referred to in the EA is the long-ago constructed Eden Project built by Reclamation. The EA was prepared to evaluate and disclose the environmental consequences of expanding a cooperative agreement with Trout Unlimited that provides for work to enhance 41 miles of stream channel. The EA states that salinity had increased as a result of the construction of the Big Sandy Reservoir and associated irrigation.

Studies have documented that salt control is occurring in the USDA project as planned. The following is a table that summarizes the results of the onfarm program as reported by USDA in Monitoring and Evaluation reports that have been prepared each year since the beginning of the USDA salinity control effort.

Big Sandy Unit of the USDA Colorado River Salinity Control Program (now EQIP)

Data as Reported in the Natural Resources Conservation Service's Monitoring and Evaluation Reports for the Big Sandy Unit of the Colorado River Salinity Control Program

<u>Federal Fiscal Year</u>	<u>Cumulative Systems - Number and Acreage</u>	<u>Cumulative Reduction in Deep Percolation Acre-feet per year</u>	<u>Cumulative Salt Load Reduction Tons per year</u>
1998	105 and 8,327	11,791	30,657
1997	101 and 7,983	11,496	29,890
1996	81 and 6904	9,790	25,454
1995	79 and 6682	9,477	24,641
1994	72 and 5896	8,582	22,313
1993	60 and 4993	7,222	18,774
1992	38 and 3,263	4,831	12,557
1991	25 and 2,162	3,246	8,440
1990	12 and 1,175	1,896	4,931

The table shows that from the beginning of the USDA salinity control project at Big Sandy through the 1998 fiscal year, 105 systems have been improved. These systems irrigate 8,327 acres. From the total effort through 1998, there has been a reduction of 11,791 acre-feet of deep percolation per year. That has resulted in a total reduction of 30,657 tons of salt loading from the Big Sandy area per year.

Mr. Zakotnik's letter also addressed the fact that the Big Sandy Project is not an integrated project with both Reclamation and USDA components and that the 1999 Review report (at page 4-3) noted that the two programs have purposely been designed to be highly integrated. The Forum notes

that Reclamation did study opportunities for a Reclamation salinity control project at Big Sandy and concluded (in a 1985 report) that there was not a cost-effective project for Reclamation to pursue at that area.

The final comment made in Mr. Zakotnik's letter concerned the effects that the installation of sprinklers has had on the delivery of water and asserted that consideration has not been given, many times, to what happens to the overflow from ponds used to supply water to the sprinklers. The USDA advises that proposals have been made in the past to improve the delivery of water to the individual sprinklers and that such activities could have been cost-share funded under the now-defunct USDA Colorado River Salinity Control Program (CRSCP - now combined into EQIP). The local irrigation district board has been unwilling to allow pump diversion points for the numerous sprinkler systems that have been installed to be located in canal laterals, nor has the board been willing to consent to the design and installation of automated wasteways and regulating reservoirs within the canal system. Funding was provided by the Wyoming Water Development Commission in the early 1990's for a study on the feasibility of constructing additional canal wasteway and storage regulation features within the Eden Valley Irrigation and Drainage District. The District declined to proceed with project improvements identified in the study that would have improved the system's water delivery and regulation capabilities to accommodate the sprinklers. It is true, as Mr. Zakotnik states, that the irrigation delivery system was not designed for sprinklers and that without modification, the present system will continue to be unable to only deliver the water the sprinklers need.

Selenium Control

The California Regional Water Quality Control Board, Colorado River Basin Region (Regional Board), with headquarters in Palm Desert, California, provided both oral and written comment. While the Regional Board applauded the efforts of the Colorado River Basin Salinity Control Forum and encouraged the acceleration of the Salinity Control Program, the Regional Board commented that the control of selenium in the Colorado River Basin would be most important. The Regional Board cited the impacts of selenium in the area of Southern California under its administration. The Regional Board wrote "we recommend that the Colorado River Basin Salinity Control Forum take efforts to address selenium as a part of its overall salinity reduction efforts. Specifically, we recommend that member agencies of the Salinity Control Forum take efforts to identify the sources of selenium in the Colorado River Basin, determine which sources of selenium are controllable, and take actions to address these controllable sources." As a point of clarification, it should be noted that there are no formal member agencies of the Salinity Control Forum. The Forum is composed of Forum members appointed by the Governors of the seven Colorado River Basin States to represent their respective state at the Forum. However, a number of the Forum members are employed by state water quality agencies, and there are many federal and state agencies involved in investigating salinity issues and implementing salinity control measures.

The Forum has previously discussed the issue of potential damages that may be experienced by Colorado River water users from specific ions such as selenium. The Forum has concluded in the past and reaffirms its conclusions now that the Salinity Control Program, and the associated

water quality standards, only relate to the combined concentration of all total dissolved solids and not to any particular constituent. The Forum has decided, by the adoption of the 1999 Review report, to reaffirm its commitments to the water quality standards that call for the control of total dissolved solids at three downstream measuring points. However, the Forum, its members, and the referenced agencies are aware of impacts that can result when selenium reaches toxic levels.

There have been numerous discussions at the Forum meetings and at the Forum's Work Group meetings about ways that the Salinity Control Program can be used in a symbiotic way with other programs that are designed to control selenium. It is intuitive that in areas where selenium is being leached from the soil that measures to control the leaching of other salts will also be effective in reducing the leaching of selenium. However, quantitative studies are lacking in this regard and within the last two years the Basin states have agreed on the implementation of a demonstration selenium control project in the Montrose area of the Gunnison Basin in Colorado, where salinity control funds and National Irrigation Water Quality Program funds available to the Department of the Interior are being used to line a canal. This project includes a monitoring program so that the potential relationships between salinity and selenium loading and control in this specific area can be observed. The project is more than 50% complete and total expenditures are expected to reach approximately \$1 million. The seven Colorado River Basin states are cost-sharing in the salinity control portion of this effort.

The Bureau of Reclamation's current Basinwide Salinity Control Program has also supported the conversion of the sewage treatment facility operated by the Ashley Valley Sewer Management Board for Vernal City and others from sewage lagoons to a mechanical system with a cement lined oxidation ditch. The lagoons have been found to be responsible for the leaching of a significant amount of salts, including selenium. The project is now under construction and is expected to be in operation by December, 2000. This project will control both salinity and selenium in a cost-effective way.

A most recent report, dated August 1999, in the Journal of the American Water Resources Association, authored by Richard A. Engberg, was entitled "Selenium Budgets For Lake Powell and the Upper Colorado River Basin System." Insight as to the selenium loading mechanism in the Colorado River system can be gained by reading this report. The report finds that of the selenium loading that occurs in the Colorado River above the Colorado/Utah state line, approximately 95% of that selenium loading occurs in the Grand Valley of Colorado and from the Lower Gunnison and Uncompahgre Valley area near Delta and Montrose. The Forum notes that the largest single salinity control effort that has been undertaken by the Salinity Control Program is in the Grand Valley of Colorado. Additionally, significant efforts have been undertaken in the area of the Gunnison River, and it is in this area that the above referenced salinity/selenium control effort is being undertaken and monitoring is occurring. The report further finds that about 51% of the selenium loading that is occurring in the Green River Basin is occurring along Ashley Creek near Jensen, Utah. This is the precise area where the aforementioned Ashley Salinity Control Project has been undertaken. Thus the salinity control program is already active in areas with known selenium loading and has probably already had positive impacts on basinwide selenium levels.

In summary, it is the belief of the Forum that it must keep its focus on cost effective salinity control and not assume obligations to address particular constituents such as selenium. However, the Forum will continue to encourage cost shared partnerships that control salinity and also mitigate other environmental concerns, with special attention given to selenium control possibilities. Over the next three years, prior to the 2002 Triennial Review, the Forum will evaluate the role it might play in addressing selenium problems.

Review of Numeric Criteria to Determine Whether Criteria Should be Lowered

The Mono Lake Committee and the Education for Sustainable Living comments given orally at the Los Angeles meeting included a statement that the numeric criteria should be reviewed to determine if the criteria should be lowered. One of the purposes for the triennial review effort is to review the numeric criteria. This has been done during each of the triennial review efforts and it was done in connection with the 1999 Review. In fact, in the 1999 Review, the Forum chose to, for the first time, include a separate chapter, Chapter 3, on the numeric criteria. On page 3-4 of the Review, the statement is made that “the Forum finds the current numeric criteria are adequate and that no changes are required at this time.” This statement is part of a section of the chapter in the Review that is entitled “Review of the Numeric Criteria.” In the section, the review of the numeric criteria is explained. The Forum can review the numeric criteria at any time and most certainly will review the criteria in connection with the next review, the 2002 Review.

BRYNER HANSEN DITCH CO.
390 WEST 1ST NORTH
HELPER, UTAH 84526

August 14, 1999

Jack Barnett, Executive Director
Colorado River Salinity Control Forum
106 West 500 South, Suite 101
Bountiful, Utah 84010

To the Colorado River Salinity Control Forum,

I refer to the Colorado River Salinity Control triennial review report detailing salinity control practices within the Colorado River Basin. We conclude from the report that much progress is being made in implementing salinity control practices within the area. Be advised that we support the adoption of these control practices. The salinity control practices by the Bureau of Reclamation, from which we are a recent project funding recipient, and USDA programs have benefited us along with many down stream users of Colorado River water.

Our water users are prepared and willing to install salinity control practices provided financial assistance is available. We, therefore, support and urge that the USDA be provided with adequate resources to fund their portion of the program. We feel it is imperative that a commitment is made to USDA funding to meet the objectives of the Forum in meeting the water quality standards for lower basin states.

Sincerely



Bryner, Hansen Ditch Co.
Albert J. Breznick
Secretary & Treasurer



California Regional Water Quality Control Board

Colorado River Basin Region



Winston H. Hickox
Secretary for
Environmental
Protection

Internet Address: <http://www.swrcb.ca.gov/~rwqcb7>
73-720 Fred Waring Drive, Suite 100, Palm Desert, California 92260
Phone (760) 346-7491 · FAX (760) 341-6820

Gray Davis
Governor

TO: Colorado River Basin Salinity Control Forum
106 West 500 South, Suite 101
Bountiful, UT 84010

SUBJECT: Selenium in the Colorado River

DATE: AUG 23 1999

We applaud the efforts of the Colorado River Basin Salinity Control Forum and all of its members in working to control salt in the Colorado River. In our region, located in the southeastern corner of California, one component of the salinity in the Colorado River that is of particular concern is selenium.

Selenium occurs in natural waters most commonly as selenious acid and selenic acid, which correspond, respectively, to the salts selenite and selenate. Selenium is present in many rock and soil formations in the Colorado River Basin, and its concentration in the Colorado River is increased by activities such as agriculture and mining, which increase erosion in these seleniferous formations. Selenium is a constituent of concern when it is present at elevated levels, due to its ability to bioaccumulate in animal tissue, and its harmful effects at elevated concentrations. Selenium toxicity can lead to reproductive failure, deformities, and death among aquatic organisms and water birds and can also adversely affect people.

The Salton Sea, located in Southeastern California, is fed almost entirely by Colorado River water that is imported for agricultural purposes via the All-American Canal. The Salton Sea provides vital habitat for more than 380 species of birds, including threatened and endangered birds such as the Brown Pelican and the Yuma Clapper Rail, and is an important link on the Pacific Flyway. The Salton Sea also supports several fish species, including the endangered desert pupfish, and a productive sport fishery.

Due to the high rates of evaporation in the Salton Sea watershed, salts that are present in Colorado River water are further concentrated in the watershed. This evaporation causes the concentration of selenium in the New and Alamo Rivers, the main tributaries to the Salton Sea, to be approximately three times the concentration of selenium in the lower Colorado River; the concentration of selenium in the New and Alamo Rivers is approximately 6 ppb, while the concentration of selenium in the lower Colorado River is approximately 2 ppb (1). Nearly all of the selenium present in the Salton Sea Watershed is imported via Colorado River Water (2). In addition, efforts to conserve water in the Imperial Valley by reducing agricultural surface runoff threaten to further increase the concentrations of selenium in the waterbodies feeding the Salton Sea, due to the high concentrations of selenium present in subsurface agricultural drain water (approximately 25 ppb). This potential increase in selenium concentrations due to water conservation may have the effect of impeding water conservation efforts in the Imperial Valley.

Biological effects of the concentrations of selenium present in the tissues of fish and birds in the Salton Sea watershed include reproductive depression in migratory birds and hazards to the reproduction of the desert pupfish (3). In addition, the concentrations of selenium present in fish in the Salton Sea watershed make these fish hazardous food items for birds and potentially humans. In response to concerns about health effects of selenium accumulation, California's Health Advisory Board has issued a warning stating that people should not consume more than four ounces of fish caught in the Salton Sea in any two week period.

In addition to the effects of concentrated levels of selenium in the Salton Sea watershed, preliminary data from both Arizona (4) and California (5) have shown elevated levels of selenium in the tissues of some fish samples taken from backwaters of the lower Colorado River itself. The levels of selenium present in these fish tissue samples were above the 2 ppm (wet weight) Health Advisory Threshold for fish consumption (6). Also, selenium concentrations found in the tissues of asiatic clams taken from the lower

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Colorado River indicate that sufficient bioaccumulation of selenium is occurring in the clams to present a possible threat to higher trophic organisms (1).

Due to these concerns, we recommend that the Colorado River Basin Salinity Control Forum take efforts to address selenium as part of its overall salinity reduction efforts. Specifically, we recommend that the member agencies of the Salinity Control Forum take efforts to identify the sources of selenium in the Colorado River Basin, determine which sources of selenium are controllable, and take action to address these controllable sources.

Sincerely,


PHIL GRUENBERG
Executive Officer

CC: Gerald Zimmerman, Colorado River Board of California
Region 7 Board Members
Tom Kirk, Salton Sea Authority, La Quinta
Jesse Silva, Imperial Irrigation District, Imperial
Clark Bloom, Sonny Bono Salton Sea National Wildlife Refuge Complex, Brawley
Carol Roberts, US Fish and Wildlife Service, Carlsbad
Al Goff, International Boundary and Water Commission, Yuma, AZ
Walt Pettit, State Water Resources Control Board, Sacramento
Jim Stubchaer, State Water Resources Control Board, Sacramento
Bill Steele, US Bureau of Reclamation, Boulder City, NV
Arizona Dept. of Environmental Quality, Phoenix, AZ

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CR SC

References

- (1) Setmire, James. 1998. Selenium in Water, Sediment and Transplanted Corbicula in Irrigation Drainage and Wildlife Use of Drains in the Imperial Valley, California 1994-1995. National Irrigation Water Quality Program, US Department of the Interior, Washington, D.C.
- (2) Setmire, J. G., and R.A. Schroeder, J.N. Densmore, S.L. Goodbred, D.J. Audet, and W.R. Radke. 1993. Detailed study of water quality, bottom sediment, and biota associated with irrigation drainage in the Salton Sea Area, California. U.S. Geological Survey, Washington, D.C.
- (3) Bennett, Jewel. 1998. Biological Effects of Selenium and Other Contaminants Associated With Irrigation Drainage in the Salton Sea Area, California 1992-1994. National Irrigation Water Quality Program, US Department of the Interior, Washington, D.C.
- (4) Metz, G. D., Field Supervisor, FWS Ecological Services. October 1985 memorandum to FWS Regional Director summarizing Arizona Selenium Data.
- (5) California State Water Resources Control Board. Toxic Substances Monitoring Program 1976-1995.

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(6) U.S. Department of the Interior, National Irrigation Water Quality Program. 1998. Guidelines for Interpretations of the Biological Effects of Selected Constituents in Biota, Water, and Sediment. U.S. Department of the Interior.



August 17, 1999

**"Strength Through
Diversity"**

Mr. Jack Barnett, Executive Director
Colorado River Salinity Control Forum
106 West 500 South, Suite 101
Bountiful, Utah 84010

Michael Milovich
Commissioner
(435) 636-3272

To the Colorado River Salinity Control Forum,

This letter is written in support of the findings of the Colorado river Salinity Control triennial review report. The report detailed the progress of the Forum in implementing salinity control practices within the Colorado River Basin. Our organization fully supports the adoption and application of salinity control practices within our watershed areas. The salinity control programs of the Bureau of Reclamation, and USDA programs, and basin states cost sharing programs have benefitted millions of downstream water users of the Colorado River, but there is much more work to reduce salinity levels left to accomplish.

William D. Krompel
Commissioner
(435) 636-3273

Our organization supports acceleration of the salinity control programs, especially in getting the USDA portion of the program to adequate funding levels of twelve million dollars per year from the EQIP program. Local producers are ready, willing and able to install salinity control practices, if adequate financial and technical assistance is available. It will take a strong USDA funding commitment to keep up the progress made by the Forum to date, and in the future to meet the water quality criteria for lower basin states.

Tom Matthews
Commissioner
(435) 636-3271

Sincerely,

Three handwritten signatures in black ink are written over horizontal lines. The first signature is "William D. Krompel", the second is "Mike Milovich", and the third is "Tom Matthews".
William D. Krompel Mike Milovich Tom Matthews

Carbon County Commission

August 18, 1999

Jack Barnett, Executive Director
Colorado River Salinity Control Forum
106 West 500 South, Suite 101
Bountiful, UT 84010

To the Colorado River Salinity Control Forum,

The Carbon-Emery Work Group is actively pursuing salinity control to improve the soil, water, and crop yields to cooperators. The "Forum" has placed funds into the Carbon and Emery areas for on-farm improvements. The funds greatly benefit the downstream water users but help local landowners to offset the cost of irrigation improvements, a burden that most could not afford to implement. Your support has helped us secure other funds from EQIP, ARDL, and others.

Our work group certainly supports the adoption and application of salinity control practices within our watershed areas. The salinity control programs of the Bureau of Reclamation, the USDA programs, and basin states cost sharing programs have benefited many downstream water users of the Colorado River, but there is still much to accomplish.

We support the acceleration of the salinity control programs, especially in getting the USDA portion of the program to adequately fund levels of twelve million dollars per year from the EQIP program. It will take a strong USDA funding commitment to keep up the progress made by the Forum to date, and in the future to meet the water quality criteria for lower basin states.

Sincerely,



Roger O. Barton, Chairman
Carbon-Emery Work Group

EDEN VALLEY IRRIGATION & DRAINAGE DISTRICT
P O BOX 174
FARSON, WYOMING 82932
(307) 273-9566

August 24, 1999

Colorado River Basin Control Forum

Eden Valley Irrigation and Drainage District wishes to comment on the 1999 Review of the Colorado River Water Quality Standards for Salinity, Colorado River System. We would recommend that there be more cooperation between federal agencies and also with the local governments when salinity control plans are being developed. The plans should use a holistic approach. Page 4-3 states that Reclamation projects and the USDA program have been designed to be highly integrated. We have not found this to be the case.

The focus of the Big Sandy project has been entirely on-farm improvements. When the project was being considered the Bureau of Reclamation decided that the cost of improving the irrigation delivery system would be too high. The irrigation delivery system was not designed for sprinklers and it is not possible to only deliver the water that the sprinklers need. Ditch loss, which may be a higher percentage now than when the project was all flood irrigated, also contributes to the seepage into the shallow aquifers.

We are particularly concerned about this because the Monitoring and Evaluation Report for the Big Sandy Unit has shown an increase in the Tons of salt per year from 1989 until 1997. NRCS does not seem to be concerned because they are using their computer models, which predict the tons of salt saved per year. However, in the Draft Environmental Assessment for the Big Sandy Rock Sills Project issued by the Bureau of Reclamation, March 1999, pg. III-5 states: "The U.S. Geologic Survey gauging station monitoring at Gasson Bridge has shown that pre-Eden Project salinity rates were in excess of 300 tons per day TDS for 13 out of 36 months. After the Project monitoring has shown increases in TDS in excess of 300 tons per day for 27 out of 36 months.

We are being told that the Big Sandy River Unit project is viable and cost effective. Information in the Monitoring and Evaluation Report, which the public reads, should reflect this or the project should be reevaluated with new recommendations for salinity control.

There is also a lack of coordination with local government. It has been the Eden Valley Irrigation and Drainage District's experience that when sprinklers have been designed, many times how the sprinklers will effect the delivery of water and what happens to the overflow from the ponds needed to supply water to the sprinklers has not been considered. This has caused Eden Valley Irrigation and Drainage District considerable expense and headaches.

Thank you for considering our comments.

Gary Zakolnik
Aya Zakolnik

August 18, 1999

Jack Barnett, Executive Director
Colorado River Salinity Control Forum
106 West 500 South, Suite 101
Bountiful, UT 84010

To the Colorado River Salinity Control Forum,

Ferron Canal and Reservoir Company is currently into its second phase of the Ferron Salinity Project. Forum funds have been used in Ferron to help landowners install sprinkling systems on their farms. We could not afford to make such improvements on our own and the landowners are showing great willingness with a 100% participation rate on the South Lateral, and an overall projected participation rate of 95-98%.

We appreciate the help of "Forum" dollars and have already noticed salty areas drying up. This will benefit those who are downstream by improving the water quality. Our project is 50% funded for on-farm projects and we certainly need to secure funds for the remainder. Therefore, we fully support the adoption and application of salinity control practices within our watershed. The salinity control programs of the Bureau of Reclamation, and USDA programs, and basin states cost sharing programs have benefited millions of downstream water users of the Colorado River, but there is much more that needs to be done.

Water is vital to us and to increase efficiency of use plus improve the soil and water quality is a big benefit of "Forum" dollars.

Sincerely,



Tracy F. Behling, Pres.
Ferron Canal & Reservoir Company

Los Angeles
WATER AND POWER ASSOCIATES, INC.

A Non-Profit Corporation Dedicated to the Public Interest

Mr. Jack Barnett
Executive Director
Colorado River Basin Salinity Control Forum
106 West 500 South, Suite 101
Bountiful, UT 84010

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President Emeritus

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Estela Lopez
Le Val Lund
Richard Marcoullier
Kenneth S. Miyoshi
Michael T. Moore
Robert V. Phillips
Anthony Provenzano
John O. Russell
Abe Tamarin
James F. Wickser
Beverly Ziegler

Colorado River Basin Salinity Control Forum

Dear Mr. Barnett:

The Water and Power Associates, Inc. is a nonprofit, independent, private organization, incorporated in 1971, for informing and educating its members, public officials and the general public on critical water and energy issues affecting the citizens of Southern California and the state.

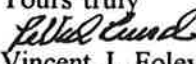
Our organization has reviewed the "1999 Review, Water Quality Standards for Salinity, Colorado River System" and support the plan and the proposed budget to implement the plan.

The plan of implementation as set forth in this review is designed to meet the objective of maintaining the salinity concentrations at or below the numeric criteria while the basin states continue to develop their compact water apportionment.

Southern California is concerned with the salinity concentrations in Colorado River water. We are concerned about scaling problems in plumbing, appliances and equipment in residences, businesses, industry and salinity in the water used for agricultural purposes. Salinity also has a negative impact on recycled water and groundwater basins.

The Associates urge the Bureau of Reclamation, Bureau of Land Management and the Department of Agriculture to work together to develop jointly salinity control measures which are viable and cost effective. Water conservation within irrigation projects on saline soils is the single most effective salinity control measure found. By integrating the USDA on-farm irrigation improvements with USBR off-farm improvements, high efficiencies can be obtained.

We support the Forum in urging Congress to insure the funds necessary to successfully fulfill this plan of implementation. In order to restore funding to the 1992-94 levels, We support S. 1211 (Bennett, UT) Colorado River Basin Salinity Control Act of 1999 which proposes to increase the ceiling for the USBR basinwide salinity control plan from \$75 million to \$ 175 million.

Yours truly

FOR Vincent J. Foley
President

c Mr. Gerald R. Zimmerman

LL 8-22-99

2616 E. Timberlake Drive ~ La Crescenta, California ~ 91214
(818) 957-0826

STATEMENT
OF
THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA
BEFORE THE COLORADO RIVER BASIN SALINITY CONTROL FORUM¹
AUGUST 23, 1999

EXECUTIVE DIRECTOR BARNETT AND MEMBERS OF THE FORUM:

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity to submit this statement regarding the report "1999 Review, Water Quality Standards for Salinity, Colorado River System" (1999 Review) prepared by the Colorado River Basin Salinity Control Forum (Forum). Metropolitan supports the report's plan of implementation to maintain the salinity concentrations at or below the numeric criteria through the year 2015. We urge the adoption of the 1999 Review by each of the Colorado River Basin states. Metropolitan is a public agency created in 1928 to meet supplemental water demands of those people living in what is now portions of a six-county region of Southern California. Today, the region served by Metropolitan includes over 16 million people living on the coastal plain between Ventura and the international boundary with Mexico. It is an area larger than the State of Connecticut and, if it were a separate nation, would rank in the top ten economies of the world.

Included in our region are more than 225 cities and unincorporated areas in the counties of Los Angeles, Orange, San Diego, Riverside, San Bernardino, and Ventura. We provide more than half the water consumed in our 5,200-square-mile service area. Metropolitan's water supplies come from the Colorado River via the Colorado River Aqueduct and from northern California via the State Water Project's (State project) California Aqueduct.

Introduction

Metropolitan supports the federal funding level recommended in the 1999 Review. It is important that water source controls for salinity continue to be implemented to assist in achieving Metropolitan's imported water salinity target of 500 milligrams per liter. The high salinity concentration of Colorado River water results in financial impacts to residential, commercial, industrial, and agricultural water users as well as groundwater and recycled water resources and utility distribution systems. It is vital that the President and Congress provide the U.S. Bureau of Reclamation, the U.S. Department of Agriculture, and the U.S. Bureau of Land Management with the funding necessary to successfully carry out their commitment to natural resources conservation.

¹ Presented by Dennis B. Underwood, Executive Assistant to the General Manager in Los Angeles, California.

Salinity Impacts In Southern California

Salinity has always been a concern of water resource managers in Southern California. When salinity concentrations of imported water are reduced, the region benefits from improved use of local groundwater and recycled water and reduced costs to water consumers and utilities. Metropolitan estimates that \$95 million of economic benefits would result annually if the Colorado River Aqueduct and State project waters were to simultaneously experience a 100 milligram per liter reduction in salt content from their historic average. Conversely, about the same dollar amount of impacts would result if imported water salinity increased by 100 milligrams per liter.

Recently, Metropolitan conducted a Salinity Management Study (Study) in close collaboration with its member agencies and numerous other concerned agencies including the U.S. Bureau of Reclamation. The Study identifies the impacts of salinity on the coastal plain of Southern California and recommends a long term strategy and action plan.

About half of the region's salt is contributed by imported water, and the other half comes from local sources. Colorado River water constitutes Metropolitan's highest source of salinity, varying from 535 to 734 milligrams per liter since 1972. Hardness comprises about one-half of the Colorado River Aqueduct salt load and causes troublesome scaling problems to indoor plumbing appliances and equipment in homes, businesses and industries.

The State project provides Metropolitan with lower salinity water, which can be used to blend down Colorado River Aqueduct concentrations. State project salinity levels can change rapidly in response to hydrologic conditions, and such changes are noticeable and disruptive as compared to the very gradual, almost imperceptible changes that occur in local streams, groundwater and wastewater collection systems. A CALFED Bay-Delta solution could lower State project salinity by 100 milligrams per liter and reduce its short-term variability. Local salinity sources include naturally occurring salts, salts added by urban water users, infiltration of brackish groundwater into sewers, irrigated agriculture, and confined animal waste management practices. Urban use salt contributions to wastewater range from 250 to 400 milligrams per liter or more in some locations.

Metropolitan's Action Plan

Metropolitan's Board of Directors adopted a salinity management policy and corresponding Action Plan in April 1999. Metropolitan is committed to the following long-term policy to control salinity:

- Protect Metropolitan's imported source supplies from additional salinity, and where feasible seek reductions.
- Achieve, to the extent reasonable and practical, a total dissolved solids concentration objective of 500 milligrams per liter in Metropolitan's distribution system.

- Recognize that natural events beyond Metropolitan's control will at times increase the salinity of imported water supplies, hindering Metropolitan's ability to continuously meet its 500 milligram per liter objective.
- Optimize the long-term use of State project supplies in conjunction with Colorado River water in pursuing salinity management objectives and Metropolitan's integrated resource plan.
- Integrate water quality and quantity objectives in planning facilities and resources.
- Support regional regulatory and management actions to minimize salinity contributions to groundwater and recycled water resources.
- Make the Salinity Action Management Plan the primary strategy to carry out this policy. Regularly assess the implementation and results of the Action Plan, and make revisions based upon experience gained and changing conditions.

The Action Plan consists of four basic components:

- Imported water source control actions,
- Distribution system salinity management actions,
- Collaborative actions with other agencies, and
- Local actions to protect groundwater and recycled water supplies.

The foundation of Metropolitan's action plan is an imported water salinity target of 500 milligrams per liter. Managing imported water salinity through blending would be supplemented by source control in the two imported water river systems, storage and exchange operations along the Colorado River Aqueduct, and a CALFED solution. Blending in Metropolitan's system is achieved by curtailing delivery of higher-salinity Colorado River Aqueduct water and substituting it with comparable amounts of lower-salinity State project water.

Colorado River Basin Salinity Control Program Funding

Metropolitan is greatly concerned with the shortfall of salinity control reported by the Forum. By 1998, an additional 384,000 tons of salinity control were to have been in place to offset water development. This shortfall in salinity control can be attributed to the limited federal funding which has been made available for salinity control over the past five years.

It is imperative that adequate federal funding be provided to meet the goals of the Colorado River Basin Salinity Control Program (Program). Metropolitan supports the 1999 Review's conclusion that about \$17.5 million in federal funding is needed each year through the planning period for the Bureau of Reclamation's portion of the Program. We agree that the U.S. Department of Agriculture should increase federal funding for the Colorado River salinity control activities of the Environmental Quality Incentives Program to \$12 million per year and designate the Colorado River Basin as a national conservation priority area. Metropolitan also recognizes the important role that the Bureau of Land Management plays in controlling salt contributions from non-point sources and the necessity for adequate federal funding.

On June 10th, Senator Robert F. Bennett (R-UT) introduced S. 1211, the Colorado River Basin Salinity Control Reauthorization Act of 1999, to increase the authorized ceiling for Reclamation's Basinwide Salinity Control Program from \$75 million to \$175 million. The Basinwide Program,

which awards federal funds for salinity control projects based on competitive bids from the private sector and local and state governments, has proven to be a very successful program, with an average cost effectiveness of \$27 per ton of salt controlled thus far, compared to the original program with a cost effectiveness of \$76 per ton. Metropolitan supports the enactment of S. 1211.

Conclusion

We urge the adoption of the 1999 Review by the Basin states and its approval by the U. S. EPA, and increased federal funding for the Colorado River Basin Salinity Control Program. Thank you for your consideration of our statement.

Moore Group Salinity Project
Perry Bunderson
Moore Route
Ferron, Utah 84523

August 20, 1999

Jack Barnett, Executive Director
Colorado River Salinity Control Forum
106 West 500 South, Suite 101
Bountiful, UT 84010

To the Colorado River Salinity Control Forum

Our group is writing in support of accelerated funding for the EQIP program in order to keep pace with the BOR portion of the Colorado River Salinity Control program.

Our understanding is that twelve million dollars per year is needed from the EQIP program.

Please add our name to those who believe the best use of USDA dollars is to complete each project as rapidly as possible. Our group fully supports the application of salinity Control within our watershed and is hoping there will be funding to do the on farm portion this coming year.

We compliment you on the many excellent projects completed to date and hope for the continued success of the Forum.

Sincerely,



The Moore Group
Perry Bunderson Group Leader

**Price River Soil Conservation District
350 North 400 East
Price, Utah 84501
(435) 637-0041 ext. 21**

August 16, 1999

Jack Barnett, Executive Director
Colorado River Salinity Control Forum
106 West 500 South, Suite 101
Bountiful, Ut. 84010

Dear Mr. Barnett:

Subject: EQIP Funding

This letter is written in support of the findings of the Colorado River Salinity Control triennial review report. The report detailed the progress of the Forum in implementing salinity control practices within the Colorado River Basin. Our organization fully supports the adoption and application of programs of the Bureau of Reclamation, and USDA programs, and basin states cost sharing programs have benefited millions of downstream water users of the Colorado River, but there is much more work left to be accomplished to reduce salinity levels.

Our organization supports acceleration of the salinity control programs, especially in getting the USDA portion of the program to adequate funding levels of twelve million dollars per year from the EQIP program. Local producers are ready, willing and able to install salinity control practices, if adequate financial and technical assistance is available. It will take a strong USDA funding commitment to keep up the progress made by the Forum to date, and in the future to meet the water quality criteria for the lower basin states.

Sincerely,

A handwritten signature in black ink that reads "Lyle Bryner". The signature is written in a cursive style with a large initial "L" and "B".

Lyle Bryner

Chairman, Price River Soil Conservation District

**Price Wellington Control Board
643 South 200 East
Price, Utah 84501
(435) 637-7610**

August 19, 1999

Jack Barnett, Executive Director
Colorado River Salinity Control Forum
106 West 500 South, Suite 101
Bountiful, Ut. 84010

Dear Mr. Barnett:

Subject: EQIP Funding

This letter is written in support of the findings of the Colorado River Salinity Control triennial review report. The report detailed the progress of the Forum in implementing salinity control practices within the Colorado River Basin. Our organization fully supports the adoption and application of programs of the Bureau of Reclamation, and USDA programs, and basin states cost sharing programs have benefited millions of downstream water users of the Colorado River, but there is much more work left to be accomplished to reduce salinity levels.

Our organization supports acceleration of the salinity control programs, especially in getting the USDA portion of the program to adequate funding levels of twelve million dollars per year from the EQIP program. Local producers are ready, willing and able to install salinity control practices, if adequate financial and technical assistance is available. It will take a strong USDA funding commitment to keep up the progress made by the Forum to date, and in the future to meet the water quality criteria for the lower basin states.

Sincerely,



Wm. Dale Mathis

President, Price Wellington Control Board



San Diego County Water Authority

A Public Agency

3211 Fifth Avenue • San Diego, California 92103-5718
(619) 682-4100 FAX (619) 297-0511

August 20, 1999

Jack A. Barnett, Executive Director,
Colorado River Basin Salinity Control Forum
106 West 500 South, Suite 101
Bountiful, UT 84010-6232

Dear Mr. Barnett:

The San Diego County Water Authority has received the 1999 Review of Water Quality Standards for Salinity in the Colorado River System (1999 Review) and appreciates the opportunity to comment on this document's findings. This letter provides the Authority's comments on the 1999 Review.

In recent years, about 85 percent of the Authority's imported water supply has come from the Colorado River, via the Metropolitan Water District. We are a water wholesaler to 23 member agencies, which have relatively few local resources. Depending upon the availability of local supplies, the Authority provides between 75 to 95 percent of the water used by the region's 2.7 million people. Thus, the Colorado River has a tremendous impact on water quality in San Diego County.

The Authority has long advocated ways in which to reduce the salinity of its water supply. Excess salinity causes large, measurable economic damage to our region and adds significant costs to recycled water projects, which are an important component of our future water supply. The city of San Diego, for example, is spending millions of dollars to demineralize recycled product water so that it may be beneficially used. The Authority and its member agencies are also working hard to reduce salts introduced locally that affect such projects. However, about half the salt load in the water used for recycling comes from the Authority's water supply. A recent study by the Metropolitan Water District and the U.S. Bureau of Reclamation (Reclamation) provided data showing that a 100 mg/L reduction in TDS would avoid \$28 million in annual costs to the San Diego region.

The Authority supports the recommendations made in the 1999 Review, including the numeric salinity criteria and plan of implementation. However, we are concerned with the pace of salt load reduction and whether the long-term salinity targets may be met. As the 1999 Review indicates, the 1998 target of 1.105 million tons of salt reduction fell short by about 35 percent, leaving 384,000 tons of reduction to be made up. A similar type of shortfall was also described in the 1996 Review. The Authority hopes that the Forum's plan of implementation and recommended funding levels are sufficient for the recommended acceleration in salt removal.

MEMBER AGENCIES

CITIES
• Del Mar • Escondido • National City
• Oceanside • Poway • San Diego

COUNTY
• San Diego
(ex officio)

IRRIGATION DISTRICTS
• Santa Fe • South Bay
• Vista

PUBLIC UTILITY DISTRICT
• Fallbrook

WATER DISTRICTS
• Helix • Otay
• San Dieguito
• Vallecitos

FEDERAL AGENCY
• Pendleton Military Reservation

MUNICIPAL WATER DISTRICTS
• Carlsbad
• Olivenhain
• Padre Dam
• Rainbow
• Ramona
• Rincon del Diablo
• Valley Center
• Yuima

The Authority recognizes the need for increased and sustained federal funding to make reductions in salt loading possible, especially on an accelerated schedule. We urge the Forum to pursue its recommendation of \$17.5 million in annual appropriations for Reclamation programs, as well as \$12.0 million for U.S. Department of Agriculture (USDA) programs and \$5.2 million for Bureau of Land Management (BLM) programs. All of these programs should be held accountable for cost-effective results. The 1999 Review notes difficulties that the BLM has in both accounting for salinity control expenditures and for measuring salinity reduction accomplishments. While the 1999 Review also states that the BLM is taking actions to enable appropriate accounting, the Forum should follow this issue closely to ensure that BLM funding for salt reduction is obtaining the desired results.

The Authority recognizes that salinity reduction on the Colorado River is an intensive effort, requiring the coordination of many public and private entities. We appreciate the efforts of the Forum to achieve a program that will obtain the recommended salinity reduction results. The Authority urges all seven Colorado River Basin states to adopt the 1999 Review and its approval by the U.S. Environmental Protection Agency.

Sincerely,

A handwritten signature in black ink, appearing to read 'Maureen A. Stapleton', written in a cursive style.

Maureen A. Stapleton,
General Manager

Statement of Harold Ball,
Director, San Diego County Water Authority

For the 1999 Review
Water Quality Standards for Salinity
Colorado River System

Colorado River Basin Salinity Control Forum
August 23, 1999

- The Authority is a water wholesaler for San Diego County. We purchase supplies from the Metropolitan Water District and provide water for 23 member agencies and their 2.7 million individual water customers. Our water users and water agencies are a diverse group, ranging from big urban users such as the city of San Diego, to small, agricultural irrigation districts. Most of our water use is for M&I purposes, but although it doesn't use a lot of water, agriculture in San Diego County is a \$1 billion-a-year business. The one thing we all have in common is the need for a reliable, high-quality water supply.
- In the recent past, the Authority has received about 85 percent of its water supply from the Colorado River. San Diego County has relatively few local water resources, mostly from runoff into surface reservoirs, and these local supplies are not reliable. During 1991, near the end of a six-year drought, our local supply provided only 5 percent of our total water needs. We are working to diversify our water supply portfolio with transfers of Colorado River water from the Imperial Valley. Because of our heavy reliance on the Colorado River, water quality issues associated with the river translate almost directly to water quality impacts felt by our region. And salinity has been one of our biggest water quality issues.
- The impacts of excessive salinity in San Diego County include damages to water-using appliances at every level, from homes and small businesses to industrial processes used by manufacturing firms. High-value farm products experience reduced yields or must increase water use by leaching. Additional costs are incurred by businesses that must have high-quality water, such as our growing biotechnology sector. And additional costs are incurred to produce marketable recycled water, which is an important element of the Authority's future water supply. A recent study by the Metropolitan Water District and the U.S. Bureau of Reclamation showed that a 100 mg/L decrease in the TDS of Metropolitan's water supply would result in \$95 million of avoided costs over entire Metropolitan service area. For the San Diego region, the avoided damages of such a salinity decrease would be \$28 million per year.
- Let me give you one example of how salinity affects the cost of our local resources development. The city of San Diego recently constructed a 30-mgd water reclamation plant to meet a portion of its future needs. To meet the water quality needs of its customers, the city has to further construct a 7.6 mgd demineralization component to the plant, which will reduce TDS of the product water from 1,200 ppm to less than 1,000 ppm. The additional cost of the demineralization component will be more than \$10 million in capital and more than \$600,000 per year for operations. The excess salinity that requires demineralization comes from a variety of local

sources, but about half is from the Authority's water supply. Thus, reducing the salt load of the Colorado River is an important part of reducing local water supply costs.

- With this as background, you can understand why the Authority appreciates the efforts of the Colorado River Basin Salinity Control Forum and the many local, regional, state, and federal agencies that are working to improve Colorado River water quality. We understand that it takes an intense effort and great coordination among many public and private organizations to achieve the goals outlined in the 1999 Review.
- We agree with the Forum's findings in the 1999 Review concerning TDS targets, the Forum's plan of implementation, and recommended funding levels necessary to achieve those targets. We are concerned that TDS reduction has not occurred at the pace recommended in the 1996 Review, and urge the Forum and others to continue efforts to secure the funding needed to meet the long-term salinity goals. As the 1999 Review concludes, we must accelerate the pace of existing salt reduction programs to ensure that long-term goals can be met. We are currently enjoying relatively low TDS from current Colorado River supplies, due to hydrological reasons. But we must use this period to play "catch up" on salt reduction, and not fall behind to the point where salinity goals cannot be met when the hydrology changes.
- We urge the seven Colorado River Basin states to adopt the 1999 Review and the EPA to approve the Review. Thank you for the opportunity to present these comments and thank you for considering them.

August 18, 1999

Jack Barnett, Executive Director
Colorado River Salinity Control Forum
106 West 500 South, Suite 101
Bountiful, UT 84010

To the Colorado River Salinity Control Forum,

The San Rafael SCD is actively pursuing salinity control to improve the soil, water, and crop yields to cooperators. The "Forum" has placed funds into the Ferron area for on-farm improvements. The funds greatly benefit the downstream water users but help local landowners to offset the cost of irrigation improvements, a burden that most could not afford to implement. Your support has helped us secure other funds from EQIP, ARDL, and others.

Our district certainly supports the adoption and application of salinity control practices within our watershed areas. The salinity control programs of the Bureau of Reclamation, the USDA programs, and basin states cost sharing programs have benefited many downstream water users of the Colorado River, but there is still much to accomplish.

We support the acceleration of the salinity control programs, especially in getting the USDA portion of the program to adequately fund levels of twelve million dollars per year from the EQIP program. It will take a strong USDA funding commitment to keep up the progress made by the Forum to date, and in the future to meet the water quality criteria for lower basin states.

Sincerely,



Roger O. Barton, Chairman
San Rafael Soil Conservation District

August 16, 1999

Mr. Jack Barnett, Executive Director
Colorado River Salinity Control Forum
106 West 500 South, Suite 101
Bountiful, Utah 84010

To the Colorado River Salinity Control Forum,

The Colorado River Salinity Control report detailed the progress of the Forum in implementing salinity control practices on the Colorado River Basin. Our canal company (Stowell Mutual Canal Company) fully supports the adoption and application of salinity control within our watershed and we are writing this letter to show our support of these findings. All of the downstream water users of the Colorado River have benefited from the salinity control programs of the Bureau of Reclamation, USDA, and Basin States cost sharing programs. But as much as it has helped, there is still a tremendous amount of work to be done in order to reduce the salinity levels.

The Stowell Mutual Canal Company would especially support any efforts to attempt to get the USDA to adequately fund levels of twelve million dollars per year for the EQIP program and supports the acceleration of the salinity control programs. If adequate financial and technical assistance is available, the local producers are ready, willing and able to install salinity control practices. It will take a strong funding commitment to the USDA and Bureau of Reclamation to keep & maintain the progress that has been made by the forum to date and to meet the water quality needs for the lower basin states in the future.

Thank you for your consideration..

Sincerely,



Tom Bruno, Director
Stowell Mutual Canal Company
Rt. # 1 Box 155
Helper, Utah 84526

wp6.1/salconpr.wpd



August 23, 1999

475 W. 100 N. - VERNAL, UT 84078

Jack Barnett, Executive Director
Colorado River Salinity Control Forum
106 West 500 South, Suite 101
Bountiful, UT 84010

To the Colorado River Salinity Control Forum:

This letter is written in support of the findings of the Colorado River Salinity Control triennial review report. The report detailed the progress of the Forum in implementing salinity control practices within the Colorado River Basin. Our organization fully supports the adoption and application of salinity control practices within our watershed areas. The salinity control programs of the Bureau of Reclamation, and USDA programs and basin states cost sharing programs have benefited millions of downstream water users of the Colorado River, but there is still much more work needed to reduce salinity to acceptable levels.

The Uintah County Soil Conservation District supports acceleration of the salinity control programs, especially in getting the USDA portion of the program to adequate funding levels of twelve million dollars per year from the EQIP program. Local producers are ready, willing and able to install salinity control practices, if adequate financial and technical assistance is available.

It will take a strong USDA funding commitment to keep up the progress made by the Forum to date, and in the future to meet the water quality criteria for lower basin states and to complete the goals set for salt savings from the Uintah Basin into the Colorado River.

Sincerely,

UINTAH COUNTY SOIL CONSERVATION DISTRICT

Errol Merkley, Chairman

Gilbert Brough, Vice Chairman

Bill Rasmussen, Secretary Treasurer

Merlin McKee, Member

Cloyd Harrison, Member

Statement of
The Upper Colorado River Commission
to
The Colorado River Basin Salinity Control Forum
August 23, 1999

The Upper Colorado River Commission is an interstate compact administrative agency created by the Upper Colorado River Basin Compact of 1948. The member States of the Upper Colorado River Commission are: Colorado, New Mexico, Utah and Wyoming. Since its inception, the Commission has actively participated in the development, utilization and conservation of the water resources of the Colorado River Basin.

On behalf of the four Upper Division States, we appreciate the opportunity to provide comments to endorse past accomplishments and the proposed plan of implementation set forth by the Colorado River Basin Salinity Control Forum as outlined in the 1999 tri-annual review.

Salinity has long been recognized as one of the major problems in the Colorado River. Salinity damages in the United States portion of the Colorado River Basin range between \$500 million and \$750 million per year and could exceed \$1.5 billion per year if future increases in salinity are not controlled. Salinity control is both a western interstate water quality issue as well as an international water quality issue in meeting the requirements of Minute No. 242 pursuant to the Treaty with the United Mexican States. The Colorado River Basin Salinity Control Program is designed to maintain salinity levels in the Colorado River system within established numeric criteria while the Upper Basin States continue to develop their Colorado River Compact-apportioned waters.

Salinity of the river has fluctuated significantly over the period of record. Since the adoption of the numeric criteria by the Forum in 1975, and as a result of the implemented salinity control projects, the numeric criteria have not been exceeded. Most recently, in part because of favorable hydrologic conditions, salinity levels at the three stations on the Lower Colorado River were well below the numeric criteria. Salinity levels below Hoover Dam measured 588 mg/l, below Parker Dam measured 609 mg/l and below Imperial Dam measured 713 mg/l. The Commission supports the "1999 REVIEW, WATER QUALITY STANDARDS FOR SALINITY, COLORADO RIVER SYSTEM" and its conclusion that there is no need to modify the existing standards at this time. However, without additional salinity control measures, the salinity of the Colorado River is projected to increase above the water quality numeric criteria at the three downstream water quality stations below Hoover Dam, below Parker Dam and at Imperial Dam as a result of continued water development.

For this tri-annual review, a plan of implementation has been recommended to maintain the salinities of the Colorado River at or below the numeric criteria below Hoover Dam through the year 2015. The Forum has determined that based on average hydrology, 1.477 million tons of salt must be removed or prevented from entering the system annually to maintain the numeric criteria through 2015. With normal hydrology, 1.105 million tons of salt load reduction would have been required by 1998 in order to not violate downstream standards. However, only 721,000 tons of salt load reduction has been achieved, a shortfall of 384,000 tons. The Salinity Control Program is behind schedule; to make up this shortfall will require increased funding as outlined in the 1999 tri-annual review. Should the necessary funding levels not be provided for

the Colorado River Salinity Control Program, the probability of the water quality numeric criteria being exceeded before 2015 is greatly increased. Therefore, the Commission urges Congress and Federal agencies to provide the necessary support for the salinity control program by designating the Colorado River Basin as a national conservation priority area and allocating sufficient funding to implement the plan recommended in this tri-annual review.

On behalf of the Upper Colorado River Commission, we thank you for granting the Commission the opportunity to express its full support for the seven-state Colorado River Basin Salinity Control Forum and the plan of implementation.

**USDA Comments for Public Meetings on 1999 Triennial Review
Los Angeles, California and Lyman, Wyoming
August 23-24, 1999**

- The Natural Resources Conservation Service of United States Department of Agriculture is pleased to be present at this meeting to hear comments for the 1999 Review of the Water Quality Standards for Salinity in the Colorado River System.
- NRCS has been closely involved in the preparation of the 1999 Review document being presented for comments at this meeting.
- NRCS has been an active partner in working to accomplish the plan of implementation for the Colorado River Basin in order to comply with the established water quality standards of the Clean Water Act.
- Initial agriculture salinity cost share practices began in 1979 and 1980 with the Grand Valley and Uinta Basin projects through the Agriculture Conservation Program (ACP).
- In 1984 the Salinity Control Act was amended by Public Law 98-569.
 - This amendment permitted the Secretary of Agriculture to establish a voluntary onfarm salinity control program to be administered by USDA.
 - Funding for the USDA program was initiated in 1987.
 - Financial, technical and information and education assistance was provided to farmers and ranchers through line item funding of the program through FY 1996.
- In April 1996, the Federal Agriculture Improvement Reform Act (FAIRA) combined the functions of several USDA conservation programs including the Colorado River Salinity Control program into the Environmental Quality Incentives Program (EQIP).
- Within the last two years, the Basin states have been providing cost share funds which has greatly increased USDA's ability to implement agricultural salinity control measures on irrigated lands in the Basin within the established project areas.
- The Basin fund contributions are based on the annual amount of EQIP funding expended on agricultural irrigation practices in the 6 project areas in Colorado, Utah and Wyoming
- The functions of the Colorado River Salinity Control program are continuing on through EQIP.
- In closing, NRCS-USDA supports the 1999 Review and looks forward to continuing a major federal agency partner in salinity control efforts in the Colorado River Basin.



State of Utah

DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF WATER QUALITY

Michael O. Leavitt
Governor

Dianne R. Nielson, Ph.D.
Executive Director

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Statement of Support to the

Colorado River Basin Salinity Control Forum on August 23, 1999

I am an Assistant Director of the Utah Division of Water Quality; I represent Utah as a member of the Colorado River Basin Salinity Control Forum and wish to submit the following statement on behalf of the State of Utah.

The State of Utah, through the Divisions of Water Resources and Water Quality, strongly supports the efforts of the Forum and salinity control activities in the Colorado River Basin. The State of Utah has actively provided technical assistance through the Divisions of Water Resources and Water Quality to this worthy effort. Landowner interest and participation in the salinity control activities in the Colorado River Basin portion of Utah have been outstanding. Utah looks forward to the continuation of this important work in improving water quality for water users in Utah as well as those downstream.

Utah has examined the "1999 REVIEW - WATER QUALITY STANDARDS FOR SALINITY COLORADO RIVER SYSTEM" and concurs that there is no need to modify the standards at this time. Utah also supports the plan of implementation and urges the United States Congress to provide sufficient funds to proceed with the plan of implementation in order to meet the water quality treaty obligations of the United States to Mexico on the Colorado River as well as the water quality objectives of the federal Clean Water Act. These obligations are federal in nature and thus Congress and the federal agencies have responsibility to provide the resources necessary to meet these obligations.



Jay B. Pitkin, Assistant Director
Utah Division of Water Quality



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WATER RESOURCES

Michael O. Leavitt
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Kathleen Clarke
Executive Director
D. Larry Anderson
Division Director

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Statement of Support
from
D. Larry Anderson
to
The Colorado River Basin Salinity Control Forum
on August 23, 1999

As the Director of the Utah Division of Water Resources and Interstate Streams Commissioner for Utah, I represent Utah as a member of the Colorado River Basin Salinity Control Forum and wish to submit the following statement on behalf of the state of Utah.

The state of Utah, through the Divisions of Water Resources and Water Quality, strongly supports the efforts of the Forum and salinity control activities in the Colorado River Basin. The state of Utah has actively provided technical assistance through the Divisions of Water Resources and Water Quality to this worthy effort. Landowner interest and participation in the salinity control activities in the Colorado River Basin portion of Utah has been outstanding. Utah looks forward to the continuation of this important work in improving water quality for water users in Utah as well as those downstream. As tangible evidence of Utah's support, the Utah Board of Water Resources has provided funding to meet non-federal portions of some of the salinity control efforts and intends to continue this practice.

Utah has examined the "1999 REVIEW - WATER QUALITY STANDARDS FOR SALINITY COLORADO RIVER SYSTEM" and concurs there is no need to modify the standards at this time. Utah also supports the plan of implementation and urges the United States Congress to provide sufficient funds to proceed with the plan of implementation in order to meet the treaty water quality obligations of the United States to Mexico on the Colorado River as well as the water quality objectives of the Clean Water Act. These obligations are federal in nature and Utah would like to remind Congress and the federal agencies of their responsibility to provide the resources necessary to meet these obligations.

Thank you,

D. Larry Anderson, P.E.
Director

President
Lois Humphreys

First Vice President
David Requa

Second Vice President
Vacant



Executive Director
Peter MacLaggan

Administrative/Finance Director
Karen Roberts

Member Programs Director
Kathy Snelson

**STATEMENT
OF
WATEREUSE ASSOCIATION OF CALIFORNIA
BEFORE THE COLORAD RIVER BASIN SALINITY CONTROL FORUM**

AUGUST 23, 1999

Executive Director Barnett and Members of the Colorado River Basin Salinity Control Forum, thank you for this opportunity to submit this statement regarding the report "1999 Review, Water Quality Standards for Salinity, Colorado River System" (1999 Review) prepared by the Colorado River Basin Salinity Control Forum (Forum). My name is Peter MacLaggan. I am the Executive Director of the WaterReuse Association of California, a non-profit public-private partnership formed in 1990 to help shape public policy affecting the use of recycled water in California. The Association's membership consists of more than 250 public agencies and professionals responsible for providing water and wastewater services to more than 20 million Californians.

Our membership is recycling one-half million acre-feet of water each year for a variety of urban and agricultural uses, offsetting an equivalent demand on the state's limited surface and groundwater supplies. Over one billion dollars in public monies have been invested in recycled water infrastructure since 1990. We have identified the potential to develop an additional million acre-feet of recycled water by the year 2020. Realization of this potential will require a significant public investment.

Salt management is the single largest problem facing the water recycling industry today. The water and wastewater utilities have spent tens of millions of dollars to

improve source water quality, control salt discharges from the industrial and commercial sector and prevent saline water intrusion into the wastewater collection system to ensure an adequate water quality for the recycled water customer.

In communities receiving water from the Colorado River, the additional salt load in the source water supply significantly increases the cost of recycling water. Generally, recycled water with a salt content of over 1,000 milligrams per liter (mg/L) will be a problem for its irrigation and industrial recycled water customers. Project operators prefer to supply recycled water with a salinity of 800 mg/L or less to ensure the long-term viability of the recycled water market. Through normal use of water we generally are able to produce a reclaimed water supply with a salinity of 250 to 400 mg/L over that of the supply quality. Thus, with the Colorado River water quality varying between 535 and 734 mg/L and an adopted salinity standard of 747 mg/L at Lake Havasu, expensive source control, blending and treatment practices are necessary to ensure that recycled water is of a suitable quality to meet customer expectations. While these practices represent viable options for addressing the salinity problem, they also present serious problems. For example, the level of source control, blending and treatment required to provide recycled water of suitable quality can result in critically important water recycling project not being economically feasible.

WateReuse is greatly concerned with the shortfall of salinity control reported by the Forum. This shortfall in salinity control can be attributed to limited federal funding which has been made available for salinity control over the past five years. We urge the adoption of the 1999 Review by the Basin states and its approval by the U.S. EPA and

increased federal funding for the Colorado River Basin Salinity Control Program. Thank you for your consideration of this statement.



State Engineer's Office

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seoleg@misc.state.wy.us

JIM GERINGER
GOVERNOR

GORDON W. FASSETT
STATE ENGINEER

August 13, 1999

Mr. Jack A. Barnett
Executive Director
Colorado River Basin Salinity Control Forum
106 West 500 South, Suite 101
Bountiful, Utah 84010

Re: June 1999 report on "1999 Review - Water Quality Standards for Salinity - Colorado River System" prepared by the Colorado River Basin Salinity Control Forum

Dear Jack:

The basin-wide water quality standards for salinity consists of numeric water quality criteria for three Lower Colorado River stations and a Plan of Implementation that describes the overall Program and the specific salinity control projects that are being and will be implemented to remove sufficient salt from the River system so the salinity concentrations of the River's waters arriving at the three stations do not exceed the numeric criteria values. Under the provisions of the Clean Water Act, the water quality standards for salinity are reviewed at least once each three years and the Plan of Implementation is jointly adjusted and revised by the States and involved Federal agencies, including representatives of the Department of Agriculture, to ensure continuing compliance with the numeric criteria for salinity.

The State of Wyoming, as a Forum member, has participated in the preparation of the report entitled "1999 Review - Water Quality Standards for Salinity - Colorado River System" prepared by the Colorado River Basin Salinity Control Forum (Forum). The State of Wyoming fully concurs with the report's conclusion that the Colorado River water quality standards' numeric criteria should not be revised and should remain at the current values. We fully support the revision of the plan of implementation to maintain the salinity concentrations of Colorado River water at or below the numeric criteria.

Wyoming is convinced that the Forum's basin-wide approach to controlling salt loading is the most logical and workable means of maintaining salinity levels in the Lower Colorado River Basin at or below the established numeric criteria while water resources development continues throughout the Basin.

In our view, one of, if not the most critical issue facing the Colorado River Basin Salinity Control Program and the maintenance of the Water Quality Standards for Salinity in the Colorado River System is funding for U.S. Department of Agriculture

Jack A. Barnett
August 13, 1999
Page 2

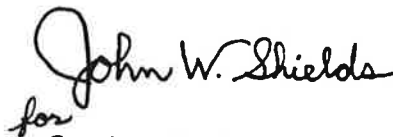
salinity control activities through the Environmental Quality Incentives Program (EQIP). As noted in the 1999 Review Report (page 5-5):

“While the USDA program has proven to be a cost-effective component of the Colorado River Basin Salinity Control Program, Administration and Congressional funding support for the program has dramatically declined. Table 5-1 reflects the significant reduction in USDA appropriations between 1994 and 1999. Funding of the USDA program at recent levels jeopardizes the ability of the plan of implementation to be executed in a manner that assures compliance with the numeric criteria (emphasis supplied).”

The State of Wyoming has actively been seeking increased appropriations for the USDA's salinity control efforts through a variety of means. We encourage other Forum members and all beneficiaries of the Colorado River Basin Salinity Control Program to vigorously work to increase Program funding. This is a critical part of the ongoing salinity control effort and it merits both concern and renewed and redoubled effort on the part of all involved to assure adequate funding is obtained for this important basin-wide program.

Thank you for the opportunity to present these views. I would ask that this letter be provided to the attendees at each of the Forum's upcoming public meetings concerning the “1999 Review - Water Quality Standards for Salinity - Colorado River System.” Should you have any questions, please don't hesitate to contact me or John Shields of my staff.

With best regards,

A handwritten signature in cursive script that reads "John W. Shields".

for
Gordon W. "Jeff" Fassett
Wyoming State Engineer
Chairman and Wyoming Member,
Colorado River Basin Salinity
Control Forum

GWF/JWS/js

cc: Dan S. Budd, Wyoming Forum Member
Gary Beach, Wyoming Forum Member

CORRECTIONS AND ADDITIONS

The Forum, having adopted the 1999 Review in June of 1999, now finds that with the publication of this supplemental report in October of 1999, there is opportunity to identify any corrections or additions that the Forum has determined need to be made to the originally adopted report.

There is one addition to the text of the report and one minor correction and several additions to the NPDES list (Appendix C) that the Forum has determined is appropriate to make. The changes are as follows:

On page 2-5 of the Review, in Table 2-1, the data from the 1998 calendar year can now be added. The values are Below Hoover Dam, 560; Below Parker Dam, 560; and At Imperial Dam, 656. It should be noted that 1996, 1997 and 1998 values are from provisional records.

On page C-8 of Appendix C, with respect to NPDES #NW0026751, the code should be changed from M-1 to M-2.

The following NPDES permits need to be added to the NPDES list (Appendix C):

NPDES #	REACH	NAME	CONCENTRATION	FLOW RATE	SALT LOAD	EXPLANATION
			MG/L	MGD	TONS/DAY	CODE
CO0039683	510	ANDRIKOPOULUS, A.G., RESOURCES	1250	0.006	0.03	M
COG310093	100	ASPEN SKIING COMPANY LLC	113	0.013	0.01	I
COG600155	801	BOC GASES	750	0.001	0.00	I
COG850013	500	COLORADO YAMPA COAL COMPANY	2008	0.031	0.26	I
CO0043095	801	DURANGO WEST METRO DISTRICT #2	148	0.058	0.04	M
CO0000141	100	GLENWOOD HOT SPRGS LODGE	16650	2.558	177.43	M-5A
COG850018	500	H-G COAL COMPANY	2083	0.218	1.89	I-6
CO0041548	801	MK-FERGUSON CO-UMTRA/DURANGO	247	0.021	0.02	I
COG850005		NCIG FINANCIAL, INC.	68	0.002	0.00	
COG640012	100	RED CLIFF, TOWN OF	156	0.001	0.00	I
CO0037206	220	WALKER RUBY TRUST MINING CO.	33	0.005	0.00	I