

October 19, 2020

*Via Email Only*

Ann Walters  
Central Valley Regional Water Quality Control Board  
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Re: Comment Letter – Draft CV-SALTS Revision Amendment Language for the Sacramento River and San Joaquin River Basin Plan and the Tulare Lake Basin Plan

Dear Ms. Walters:

The Central Valley Salinity Coalition (CVSC) appreciates the opportunity to provide written comments on the Draft CV-SALTS Revision Amendment Language for the Sacramento River and San Joaquin River Basin Plan and the Tulare Lake Basin Plan (Draft Revisions). CVSC is a non-profit coalition of public agencies, business, agriculture, and others working together to better manage salts and nitrate in California's Central Valley. By pooling resources and focusing effort in this unique association, CVSC members leverage their human and financial resources, creating economies of scale to produce needed studies and coordination with regulatory agencies. CVSC members are at the forefront of implementing CV-SALTS initiatives.

Overall, the Draft Revisions appear to be consistent with the direction provided by the State Water Resources Control Board (State Board) in Resolution No. 2019-0057. We provide here limited comments.

- Pages 17 and 19 (Redline Version) – The Draft Revisions provided here are not part of the direction provided by the State Board in Resolution No. 2019-0057. As such, the CVSC continues to question the need for these Draft Revisions. The CVSC appreciates that revisions have been made to address concerns we expressed on the Administrative Draft; however, the fundamental issue is that these Draft Revisions are beyond the scope of the resolution and the inclusion of this language at this time is unnecessary.
- Page 51 (Redline Version) – In the paragraph that addresses potential modifications to Management Zone boundaries, the last sentence references “one of the options provided under Path A.” This sentence is likely to cause confusion, as Path A does not itself contain regulatory options. Rather, Path A includes categories for characterizing the discharge, which then triggers various requirements. These are not optional. We recommend that the language “one of the options provided under” be deleted from the text to avoid confusion regarding the applicability of Path A.

- Page 54 (Redline Version) – Newly added paragraph (vii) includes reference to a “residential sampling program.” The term “residential” is very broad and could be interpreted to include sampling of homes that are served by a public water system. We understand the intent of this language is to encompass homes that are served by domestic wells or state small systems. We recognize the term “residential” is taken directly from the State Board’s Resolution No. 2019-0057; however, some clarification should be added to avoid creating an expectation that Management Zones would be setting up programs to sample homes that are served by public water systems that are already required to monitor water served.
- Page 59 (Redline Version) – With respect to Central Valley Water Board review, the Draft Revision indicates that the board will confirm if the plans are “achieving quantifiable progress.” We recommend that the word “quantifiable” be removed from this sentence as it is vague and undefined. Rather, the Central Valley Water Board will be tasked with reviewing implementation of plans to see if the plans are being implemented as approved. This review will determine if the Management Zone is compliant with the approved plan, which incorporates quantifiable interim schedules. Accordingly, it is unnecessary to use the term “quantifiable” here in this sentence.

We look forward to working with the Central Valley Water Board and others to implement the Salt and Nitrate Control Program.

Sincerely,

  
David Cory Chair  
Central Valley Salinity Coalition