(1/21/14/) Board Meeting- Item 6
CV-Salts: Annual Progress Report
Deadline: 1/16/14 by 12:00 noon

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LEADERSHIP COUNSEL FOR JUSTICE & ACCOUNTABILITY

COMMUNITY WATER CENTER
EL CENTRO COMUNITARIO POR EL AGUA

CLEAN WATER ACTION
CALIFORNIA

January 16, 2014

Felicia Marcus, Chair
State Water Resources Control Board
1001 I St.
Sacramento, CA 95814
Sent via electronic Mail

RE: Agenda Item 6: CV Salts Progress Update

Dear Chair Marcus and board members,

Our organizations - Clean Water Action, Community Water Center and Leadership Counsel for Justice and Accountability – have participated regularly in the CV Salts Coalition meetings for several years. We understand the very difficult problem of increasingly salinity, particularly in the San Joaquin Valley, and appreciate the emphasis placed by the Central Valley board staff, particularly the executive officer, on the need to assist communities that lack safe drinking water.

However, we are becoming increasingly concerned that the final recommendation from the Coalition will permit continued degradation of groundwater quality, but be considerably less rigorous in requiring measures to reduce that degradation. Specifically,

- Proposals to apply new methods of measuring assimilative capacity, including the use of "management zones" rather than specific points of compliance, have the potential to create a condition of pollution and nuisance that will impact shallow groundwater users;
- The revision of water quality objectives for secondary contaminants will reduce water quality with no corresponding mitigation required;
- Proposals to reclassify or declassify certain beneficial uses, specifically MUN classifications in to-be-determined areas could impact communities not served by a public water system.
- A proposal to provide "direct use protection" to hold communities harmless is as yet undefined in scope or funding. The UC Davis Nitrate report identified a current need of

$20 to $36 million annually to address current nitrate pollution; as the need increases, can and will dischargers address the community costs?

- Work on best practices is not being actively pursued, and it is unclear whether any specific practices will be required in the final plan;
- Some long-term solutions for reducing the salt load in the valley require expensive infrastructure investments for which costs and funding have not been identified

We ask the Board to give clear direction to the Coalition that their recommended plan *must* provide effective, measurable and feasible measures for reducing salt and nutrient loading, comply with state anti-degradation policy and also include a comprehensive, funded program for direct use protection of communities impacted currently as well as those impacted by future degradation.

We welcome any questions regarding these comments. Please do not hesitate to contact Jennifer Clary at jclary@cleanwater.org or (415) 369-9171.

Sincerely,

Phoebe Sarah Seaton
Co-Director and Attorney at Law
Leadership Counsel for Justice and Accountability

Jennifer Clary
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Laurel Firestone
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