



REGIONALSAN

TAKING THE WASTE OUT OF WATER

Sacramento Regional County Sanitation District

August 9, 2018



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Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento CA 95814

Subject: Comment Letter – Salt and Nitrate Control Program Basin Plan Amendment

Delivered via email to: commentletters@waterboards.ca.gov

Dear Ms. Townsend:

Sacramento Regional County Sanitation District (Regional San) appreciates the opportunity to provide comments to the Amendments to the Water Quality Control Plans for the Sacramento River and San Joaquin River Basins and the Tulare Lake Basin (Basin Plan Amendment) to Incorporate a Central Valley-Wide Salt and Nitrate Control Program and Staff Report.

Regional San has been an active member of the Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) Coalition and a stakeholder in that forum since 2006. We recommend the State Water Board approve the associated Basin Plan Amendment, staff report, and Salt and Nitrate Control Program. Regional San recognizes that these documents are a significant milestone in what will be a decades-long endeavor to address salt and nitrate contamination in surface waters and groundwaters in the Central Valley. The Salt and Nitrate Management Plan is a comprehensive regulatory and programmatic approach to manage and protect water quality.

It is our understanding that the Central Valley Regional Water Quality Control Board (Regional Water Board) will continue to work with the CV-SALTS Coalition and stakeholders to resolve issues and to provide future revisions to the program documents as necessary to ensure a fair and successful program. We are also confident that future issues will be resolved in a collaborative and fair manner as has been the spirit of the CV-SALTS working groups and forum.

To ensure that the Basin Plan Amendment is implemented in a fair and equitable manner, Regional San recommended to the Regional Water Board that they work with the State Water Board and other federal and state agencies to identify and account for all sources of salinity and items that impact salinity including; seawater intrusion, water releases and diversions, natural sources, etc. Accordingly, we encourage the Water Boards to work diligently to

identify additional responsible parties that impact salinity and nitrates in the Central Valley, and to identify additional stakeholders. Water quality impacts, including those of salts and nitrates, can only be addressed effectively and fairly through a holistic assessment and participation. Other identified responsible parties should participate in funding, data evaluation, studies, and taking required actions to ensure program success.

We also recommend an ongoing commitment, as stated in several sections of the Basin Plan Amendment and the Staff Report, that the Water Boards provide future periodic reviews and updates of the costs and funding responsibility as the program progresses. These reviews should include identification of newly identified responsible parties, and costs allocations or proportions to dischargers already identified in the Basin Plan Amendment and related documents. In addition, state and federal funding sources should be investigated for all Salt and Nitrate Management Plan program components.

Regional San intends to remain engaged as a Coalition member and stakeholder in the CV-SALTS program. We look forward to working with the Regional Water Board staff and CV-SALTS stakeholders on those efforts in the coming years.

Sincerely,



Terrie L. Mitchell
Manager, Legislative & Regulatory Affairs

cc: Lysa Voight, P.E. – Senior Engineer