



Grower-Shipper Association of Central California
“OUR MEMBERS: PARTNERS PRODUCING PROSPERITY”

October 31, 2016

Jeanine Townsend
Clerk to the State Water Board
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100
commentletters@waterboards.ca.gov

Sent via E-mail to
commentletters@waterboards.ca.gov

RE: Amendment to the Water Quality Control Plan for the Central Coastal Basin (Basin Plan)

Dear Ms. Townsend,

I'm writing on behalf of the Grower-Shipper Association of Central California. We represent the needs of over 350 member companies throughout Monterey, Santa Cruz, San Benito and Santa Clara counties. Please accept these comments regarding the Central Coast Regional Water Quality Control Board's proposed amendments to the Water Quality Control Plan for the Central Coastal Basin (Basin Plan).

Generally, the Central Coast Water Board was responsive to many of the comments made by GSA. We are concerned however that comments made by Grower-Shipper Association in our letter dated June 17, 2016 regarding Amendments to Clarify the Designation of Groundwater Beneficial Uses and specifically the state's Antidegradation policy were not appropriately considered (State Water Board's Statement of Policy with Respect to Maintaining High Quality of Waters in California, Resolution No. 68-16 (hereafter referred to as "Antidegradation Policy").

Generally, the State Board has made clear that the Antidegradation Policy is *not* a "zero-discharge" policy. (See, e.g., Order No. 86-10, pp. 44-45 ["Resolution No. 68-16 is not a 'zero-discharge' standard but rather a policy statement that existing quality be maintained when it is reasonable to do so."]; see also, *id.*, p. 44 ["This policy does not absolutely require existing high water quality be maintained; rather, any change must be both consistent with maximum public benefit and not unreasonably affect beneficial uses."].) We feel this is being ignored by the Central Coast Regional Board, which seems to be trying to establish a no degradation policy, which is inconsistent with the State's Anti-degradation plan. This basin plan shouldn't have statements which say you can't have degradation, instead the Basin Plan should refer to the State's Antidegradation Policy.

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Additionally, we are concerned about the addition of the following language without further clarification: “*Where wastewater effluents are returned to land for irrigation uses, regulatory controls shall be consistent with Title 22 of the California Code of Regulations and with relevant controls for local irrigation sources.*” To ensure there is no question that the regional board is referring to Publicly Owned Treatment Works (POTW), as would be expected in this Title 22 reference, we ask that to be included in this statement as follows: “*Where wastewater effluents are returned to land for irrigation uses as part of Publicly Owned Treatment Works (POTW) General Permits, regulatory controls shall be consistent with Title 22 of the California Code of Regulations and with relevant controls for local irrigation sources.*”

Thank you for the opportunity to comment on these proposed changes. Please contact me at 831-422-8844 with questions.

Sincerely,

A handwritten signature in black ink that reads "Abby Taylor-Silva". The signature is written in a cursive, flowing style.

Abby Taylor-Silva
Vice President, Policy & Communications
Grower-Shipper Association of Central California

Cc:

John Robertson: John.Robertson@waterboards.ca.gov

Steve Saiz: Steve.Saiz@waterboards.ca.gov