



December 30, 2013

Ms. Jeanne Chilcott
California Regional Water Quality Control Board
Central Valley Region
11020 sun Center Drive, #200
Rancho Cordova, CA 95670

Via email to: jchilcott@waterboards.ca.gov

Subject: Comments on CEQA Scoping for Development of Central Valley Wide Salt and Nitrate Management Plan for Incorporation into the Sacramento-San Joaquin and Tulare Lake Basin Plans

Dear Ms. Chilcott:

The State Water Contractors (SWC) appreciates the opportunity to submit these CEQA scoping comments regarding the development of a Central Valley Salt and Nitrate Management Plan (SNMP) and the incorporation of components of the SNMP into Water Quality Control Plans for the Sacramento River and San Joaquin River Basins and the Tulare Lake Basin (Basin Plans).

The SWC organization is a nonprofit mutual benefit corporation that represents and protects the common interests of its 27¹ member public agencies in the vital water supplies provided by California's State Water Project (SWP). Each of the member agencies of the SWC holds a contract with the California Department of Water Resources to receive water supplies from the SWP. Collectively, the SWC members deliver water to more than 25 million residents throughout the state and more than 750,000 acres of agricultural lands. SWP water is served from the San Francisco Bay Area, to the San Joaquin Valley and the Central Coast, to Southern California.

¹ The SWC's members are: Alameda County Flood Control and Water Conservation District Zone 7; Alameda County Water District; Antelope Valley-East Kern Water Agency; Casitas Municipal Water District; Castaic Lake Water Agency; Central Coastal Water Authority; City of Yuba City; Coachella Valley Water District; County of Kings; Crestline-Lake Arrowhead Water Agency; Desert Water Agency; Dudley Ridge Water District; Empire-West Side Irrigation District; Kern County Water Agency; Littlerock Creek Irrigation District; Metropolitan Water District of Southern California; Mojave Water Agency; Napa County Flood Control and Water Conservation District; Oak Flat Water District; Palmdale Water District; San Bernardino Valley Municipal Water District; San Gabriel Valley Municipal Water District; San Geronio Pass Water Agency; San Luis Obispo County Flood Control & Water Conservation District; Santa Clara Valley Water District; Solano County Water Agency; Tulare Lake Basin Water Storage District.

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Ms. Jeanne Chilcott

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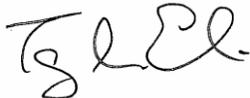
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The SWC has a significant interest in the development of the SNMPs and subsequent amendment of the Basin Plans. As you are aware, the State Water Resources Control Board's 2006 Bay-Delta Water Quality Control Plan (Bay-Delta WQCP) includes water quality objectives for chloride and salinity for the protection of municipal, agricultural, and aquatic wildlife beneficial uses. Many of these water quality objectives are implemented by assigning responsibilities to water rights holders, including the Department of Water Resources (DWR) and the U.S. Bureau of Reclamation (USBR). The SWC is concerned that the Basin Plan amendments contemplated as part of the SNMP may impact compliance with Bay-Delta WQCP salinity objectives.

The Central Valley Regional Water Quality Control Board (Regional Water Board) staff report titled *Establishment of a Central Valley Salt and Nitrate Management Plan* includes numerous elements of the SNMP that may ultimately be incorporated into the Basin Plans. These elements include changing beneficial uses for municipal and/or agricultural uses, changing water quality objectives for salinity, and adding and/or changing existing implementation plan provisions addressing salinity. These proposed actions could result in increased salinity loading to Central Valley water bodies from urban and agricultural sources. The Regional Water Board's analysis of SNMP alternatives must include evaluation of potential impacts on compliance with downstream salinity objectives, including chloride and salinity objectives in the Bay-Delta WQCP, and also include evaluation of potential water supply impacts on water rights holders assigned responsibility for meeting the Bay-Delta WQCP salinity objectives.

Thank you for the opportunity to provide these scoping comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Erlewine', with a stylized flourish at the end.

Terry L. Erlewine
General Manager