August 9, 2018

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8-10-18
SWRCB Clerk

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100, Sacramento, CA 95812-2000
1001 I Street, 24th Floor, Sacramento, CA 95814

SUBJECT: Comment Letter — Salt and Nitrate Control Program Basin Plan Amendment

Dear Ms. Townsend:

The Central Valley Salinity Coalition (CVSC) has actively participated in the development of the proposed basin plan amendments since the initial Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) meetings in 2006. We appreciate the hard work of the Regional Board staff and management as well as the stakeholders that have participated in developing, completing and supporting the comprehensive Central Valley-wide Salt and Nitrate Management Plan (SNMP). The strategies and policies contained in the SNMP are reflected in the Amendments to the Water Quality Control Plans for the Sacramento River and San Joaquin River Basins and Tulare Lake Basin to Incorporate a Central Valley-wide Salt and Nitrate Control Program (Amendments).

Formed in 2008, the CVSC assists in supporting the CV-SALTS stakeholder efforts. Since its formation, the CVSC has raised over $3 million from its members[1] to support these stakeholder efforts. In addition, the CVSC's diverse group of stakeholders has collectively spent countless hours in attending Executive Policy and Administrative meetings as well as in other technical and public outreach meetings to provide informed input into the development of the SNMP and the Amendments.

Additionally, CVSC remains committed to continuing support for the Prioritization and Optimization (P&O) Study for salts, helping form and support Management Zones for areas impacted by nitrates as well as implementing the Surveillance and Monitoring Plan. Just as we were active in development of the SNMP and Amendments, CVSC will support inclusive stakeholder participation during implementation. Taken together, these measures help assure the continued success of the program.

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[1] The CVSC's current membership includes the following organizations in Attachment 1.

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The CVSC has carefully reviewed the Amendments approved by the Regional Water Board, and believes the Amendments, Staff Report, and appendices strike an appropriate balance between all stakeholder needs and concerns. The Amendments and Staff Report approved by the Central Valley Regional Water Quality Control Board (Region 5) are consistent with the recommendations contained in the SNMP.

The CVSC strongly encourages the State Water Resources Control Board to adopt these important Amendments as submitted by the Central Valley Regional Water Quality Control Board to comprehensively address salinity and nitrate issues in the Central Valley.

Please contact Daniel Cozad at (909) 747-5240 for any questions. Thank you for your consideration of this complex and comprehensive revision to the Basin Plans.

Sincerely,

Daniel B. Cozad   David Cory
Executive Director   Chairman

The Central Valley Salinity Coalition Inc. Tax ID # 26-3103060   www.cvsalinity.org
a Non-Profit Member Benefit Corporation 360 Lakeside Ave, Redlands, CA 92373 (909) 793-8498

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Appendix 1 - CVSC Members

Current Members of the Central Valley Salinity Coalition include:

- San Joaquin Valley Drainage Authority
- California Association of Sanitation Agencies
- California League of Food Producers
- The Wine Institute
- Dairy Cares
- City of Fresno
- Central Valley Clean Water Association
- South San Joaquin Water Quality Coalition
- Northern California Water Association
- City of Davis
- City of Tracy
- City of Stockton
- City of Vacaville
- Tulare Lake Drainage and Water Districts
- Stockton East Water District
- California Cotton Growers and Ginners Association
- California Rice Commission
- San Joaquin Tributary Authority
- Western Plant Health Association
- East San Joaquin Water Quality Coalition
- San Joaquin County & Delta Water Quality Coalition
- City of Manteca
- Pacific Water Quality Association
- City of Modesto
- Sacramento Regional County Sanitation District
- California Resources Corporation
- Westlands Water District
- Valley Water Management Company
- California Independent Producers Association

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