



SAN FRANCISCO
BAYKEEPER®

May 31, 2017

Mr. Adam Laputz, Assistant Executive Officer
Ms. Jeanne Chilcott, Environmental Program Manager
Ms. Anne Littlejohn, Sr. Environmental Scientist
Mr. James Brownell, Engineering Geologist
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6144
james.brownell@waterboards.ca.gov

RE: Draft Amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins to Establish Water Quality Objectives in the Lower San Joaquin River (Mouth of the Merced River to Vernalis).

Dear Mr. Laputz, Ms. Chilcott, Ms. Littlejohn, and Mr. Brownell,

San Francisco Baykeeper (“Baykeeper”) hereby joins and incorporates by reference the comments of the United States Environmental Protection Agency (“EPA”), dated April 11, 2017, and the comments of the California Sportfishing Protection Alliance *et al.* (“CSPA”), dated April 14, 2017, requesting that the proposed amendment be withdrawn and an Environmental Impact Report or Supplemental Environmental Document be prepared, requesting a comprehensive antidegradation analysis, requesting additional information to support the proposed action, requesting additional study, and requesting that the comment period be extended. Like EPA and CSPA, Baykeeper feels that other uses, in particular aquatic life uses, are more sensitive than municipal and agricultural uses, and should be identified as the most sensitive uses when considering beneficial uses designations for surface waters.

Standards for salinity and boron that are considerably less stringent than those presently applicable at Vernalis should not be considered. The lower San Joaquin River, from the mouth of the Merced River to Vernalis (LSJR), is a struggling ecosystem that remains a critical habitat for fish and wildlife, including state and federally listed endangered and threatened species, and very little progress on improving water quality has been made since the LSJR was listed as impaired for salt and boron. Lowering standards at this time would not adequately protect beneficial uses, which includes habitat, as required under the Clean Water Act.



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In addition, Baykeeper feels that it is inappropriate to “anticipate a reduction of agricultural discharges” without first completing the procedures and study necessary to establish new baseline conditions. In other words, the Board should wait and see what the actual reductions in agricultural discharges are, and what impacts that has on water quality in the lower San Joaquin River, before any basin plan amendments based on such hypothetical reductions are finalized. Draft Staff Report, p. 130.

Thank you for your attention to this important matter. If you have any questions about Baykeeper’s comments, please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Eichenberg". The signature is fluid and cursive, with a large initial "B" and a long, sweeping tail.

M. Benjamin Eichenberg
Staff Attorney
San Francisco Baykeeper
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