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September 17, 2020

Jennifer Fuller
Central Valley Water Board
11020 Sun Center Drive, #200
Rancho Cordova, California 95670-6114
jennifer.fuller@waterboards.ca.gov

Subject: Comments on the Basin Plan Amendments (BPAs) to Incorporate Revisions to the Salt and Nitrate Control Program

Dear Ms. Fuller:

Contra Costa Water District (CCWD) appreciates the opportunity to comment on the Amendments to the Water Quality Control Plans for the Sacramento River and San Joaquin River Basins and the Tulare Lake Basin to Incorporate Revisions to the Salt and Nitrate Control Program (Amendments). CCWD relies solely on the Sacramento-San Joaquin Delta to serve clean, safe drinking water to 500,000 people in central and eastern Contra Costa County. CCWD appreciates the actions by the Central Valley Water Board to revise the Salt and Nitrate Control Program to be consistent with the directives of State Water Resources Control Board (State Board) Resolution 2019-0057.

CCWD applauds the revision of the Secondary Maximum Contaminant Level (SMCL) Policy to remove the references to the Drought and Conservation Policy. As clarified by the State Board staff during the public meeting on October 16, 2019, this revision would limit the application of interim permit limits that exceed the "Upper" salinity level as specified in the Title 22 of the California Code of Regulations (Title 22) to apply only to effluents and/or mixing zones, and not to receiving waters. In addition, the Amendments clarify that "the Drought and Conservation Policy will not be applied during Phase 1 of Salt Control Program; nor will the Policy be used as a multiple discharger variance program." These revisions will provide better protection to source water and downstream beneficial uses, especially during droughts when fresh water supplies are limited. CCWD requests that similar considerations to the use of the Drought and Conservation Policy be included in any future salinity policies developed after Phase 1 of the Salt Control Program.

CCWD also supports the new over-arching management goal to reduce salt and nitrate loading as the ultimate objective. In the short term, the requirement to maintain current discharge concentrations for salt or mass loading levels as specified in the Salt Control Program will help to manage salt loading and prepare for actions to achieve the final objective. However, implementation will be key to the successful realization of the interim and final goals. For example, to prevent discharges from exceeding current salt or nitrate levels, it is important to numerically define current discharge concentrations and mass loading levels in discharge permits and to implement sufficient and enforceable monitoring.

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Central Valley Water Board
Basin Plan Amendments to Incorporate Revisions to the Salt and Nitrate Control Program
September 17, 2020
Page 2

CCWD is looking forward to working with the Central Valley Water Board during the implementation and permitting processes, to explore ways to protect source water while addressing the drainage issues in the Central Valley.

If you have any questions, please do not hesitate to contact me at (925) 588-8127 or lshih@ccwater.com.

Sincerely,



Lucinda Shih
Water Resources Manager

YL:wec