



Stantec Consulting Services Inc.
1340 Treat Boulevard Suite 300, Walnut Creek CA 94597-7966

October 15, 2020

Attention: Jennifer Fuller
Central Valley Water Board
11020 Sun Center Drive #200
Rancho Cordova, California 95670-6114

Dear Jennifer Fuller,

Reference: Comments on Proposed 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

Stantec is pleased to provide comments to the “Proposed Amendments” to the Water Quality Control Plans for the Sacramento River and San Joaquin River Basins and the Tulare Lake Basin (Basin Plans) that revise the Central Valley-wide Salt and Nitrate Control Program, detailed in Central Valley Water Board Resolution R5-2018-0034, to be consistent with the directives of the State Water Resource Control Board Resolution 2019-0057.

We propose editing sections 2 (a) and 2 (b) on page 17 and sections 2 (a) and 2 (b) on page 19 to include the following language at the end of each section:

“Where a site-specific numeric objective is applicable but has not been adopted into the Basin Plan, a site-specific numeric objective shall be developed.”

The currently revised language of these sections only allows for a site-specific objective where one has already been “established and adopted” in the Basin Plan. This is inconsistent with the Antidegradation Policy and historic application of the narrative objectives for salinity. Further, it establishes a penalty for discharges in areas where background salinity exceeds conservative objectives. The “Proposed Amendments” include foot notes for some dischargers to address their site-specific objectives, but the foot notes are not inclusive of all recent Board decisions regarding discharge salinity limits and/or objectives. The language needs to be edited to allow for the application of site-specific objectives currently in place as well as those that are applicable.

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Our proposed edits retain compliance with the Antidegradation Policy and the narrative objectives for salinity. Particularly, water quality objectives are based on receiving water quality.

Regards,

Stantec Consulting Services Inc.



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Soil Scientist
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