

**African-American Farmers of California
Buena Vista Coalition
CA Citrus Mutual
CA Cotton Ginners & Growers Association
CA Fresh Fruit Association
California Association of Sanitation Agencies
California Farm Bureau Federation
East San Joaquin Water Quality Coalition
Kaweah Basin Water Quality Association
Kern River Watershed Coalition Authority
Nisei Farmers League
Western Agriculture Processors Association
Western Growers Association
Western Plant Health Association
Westside San Joaquin River Watershed Coalition**

March 24, 2017

Via Electronic Mail Only

Anne Littlejohn
Senior Environmental Scientist
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670
anne.littlejohn@waterboards.ca.gov

Re: Amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins to Establish a Region-Wide Municipal and Domestic Supply (MUN) Beneficial Use Evaluation in Agriculturally-Dominated Surface Water Bodies

Dear Ms. Littlejohn:

The above-listed agricultural organizations have reviewed the Amendments to the Water Quality Control Plans for the Sacramento River and San Joaquin River Basins and Tulare Lake Basin to Establish a Region-wide Municipal and Domestic Supply (MUN) Beneficial Use Evaluation Process in Agriculturally Dominated Surface Water Bodies and Remove the MUN Beneficial Use from 231 Constructed or Modified Ag Drains in the San Luis Canal Company District (Draft Amendments). The above-listed agricultural organizations appreciate the Central Valley Water Board's efforts to address the unique issues associated with agriculturally-dominated surface water bodies, and support the Draft Amendments that establish a streamlined process for evaluating the municipal and domestic (MUN) beneficial use as it applies to agriculturally-dominated water bodies. We also support the de-designation of 231 constructed or modified ag drains in the San Luis Canal Company District.

Ms. Anne Littlejohn

Re: WQCP Amendments re MUN Beneficial Use Evaluation in Agriculturally-Dominated
Surface Water Bodies

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The evaluation process proposed in the Draft Amendments sets forth a clear and methodical process for evaluating the MUN beneficial use in agriculturally-dominated waterbodies, which is something that has been needed for a number of years. Numerous agriculturally-dominated waterbodies exist throughout the Central Valley, and serve specific purposes with respect to supplying irrigation water and capturing drain water. Incorporation of the Sources of Drinking Water Policy (Resolution 88-63) had the unfortunate, unintended impact of improperly designating MUN to many of these facilities. The Draft Amendments provide a process for correcting the improper designation that occurred with that resolution.

In summary, we support the Draft Amendments. We also encourage the Central Valley Water Board to use a similar process in the near future to determine proper application of aquatic life beneficial uses. Thank you for your work on this important issue.

Sincerely,

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