



March 23, 2017

Via Email and U.S. Mail

Karl E. Longley, ScD, P.E., Chair
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670
Email: Karl.Longley@waterboards.ca.gov

Re: Comments on the Proposed Basin Plan Amendment to Establish a Region-wide Municipal and Domestic Supply (MUN) Beneficial Use Evaluation Process in Agriculturally Dominated Surface Water Bodies.

Dear Chair Longley:

The San Joaquin Tributaries Authority (“SJTA”) and its members thank the Central Valley Regional Water Quality Control Board (“Regional Board”) and Board staff for addressing the inappropriate blanket application of the MUN beneficial use to agriculturally dominated water bodies in the Central Valley Region. The SJTA appreciates the opportunity to comment on the Proposed Basin Plan Amendment as described at the Board’s February 23rd Hearing.

Your staff has worked hard to craft Basin Plan Amendment language that corrects the administrative error that occurred without changing the responsibility of all water users and dischargers to protect water quality to the highest degree possible. The SJTA supports adoption of the language as it is presently proposed by your staff. We recognize the concern of others for long-term protection of downstream water quality and we, as member of the Eastside Water Quality Coalition of your Irrigated Lands Program, will continue to do our part in protecting downstream water quality. We urge the Board to adopt the Basin Plan Amendment Language as presently written.

We would like to suggest one minor modification to the definition of “Ag Drainage” in the accompanying staff report. At present, the definition on page six reads:

Ag Drainage – Water that leaves the field following application of irrigation water.

While this definition is correct in itself, it is limited and inconsistent with how the definition of Ag Drainage is applied under the Clean Water Act and the Board’s Irrigated Lands Program. We would suggest it be reworded as follows:

Ag Drainage – Water leaving an agricultural field, either from irrigation practices or precipitation.

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This definition would provide consistency with federal and state programs and should be used in place of the definition in the staff report. This proposed broadening of the definition of Ag Drainage would in no way change the wording or intent of the Proposed Basin Plan Amendment Language.

We appreciate the opportunity to provide comments on the Proposed Basin Plan Amendment and will continue to work with your staff as we find appropriate beneficial use designations in the water supply channels of the SJTA.

Very truly yours,

O'LAUGHLIN & PARIS LLP



Valerie C. Kincaid

VCK/llw

cc: SJTA Managers
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