



March 23, 2017

Submitted Electronically

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

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 Turlock Irrigation District (TID) appreciates the effort undertaken by the Central Valley Regional Water Quality Control Board ("Regional Board") and Regional Board staff to identify and address an administrative error which unintentionally has resulted in an inappropriate blanket application of the MUN beneficial uses to all agriculturally dominated water bodies throughout the Central Valley Region unless specifically identified as not supporting MUN uses within the Basin Plan. We commend the Regional Board and its staff in taking on this difficult issue in a collaborative, inclusive manner that allowed stakeholders to work together to understand the issues and develop a solution protective of both the intended uses of these waterways as well as water quality of downstream water supplies.

TID supports adoption of the Basin Plan Amendment (BPA) language as it is presently proposed. Significant time and effort by all involved has resulted in Proposed BPA language that was carefully crafted, with input from a broad range of stakeholders. It is important to note, that while the Proposed BPA allows for the modification and/or removal of an inappropriate application of the MUN designation to agricultural waterways, the correction will not result in changes to the agricultural activities or changes to water quality. Additionally, monitoring requirements included in the Proposed BPA will ensure downstream waterways providing municipal supplies, including their upstream watersheds, continue to be monitored and protected.

TID also encourages the Regional Board to consider the proposed revision to the staff report provided by the San Joaquin Tributaries Authority (SJTA). The proposed modification would change the "Ag Drainage" definition in the staff report to include agricultural drainage leaving a field due to precipitation, as well as irrigation. Such a change would ensure the program remains consistent with the Regional Board's Irrigated Lands Program, and other state and federal programs.

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TID appreciates the opportunity to provide comments on the Proposed BPA. We encourage the Regional Board to approve the BPA with the proposed modification to the staff report, as outlined above, and look forward to continuing to work with Regional Board staff in implementing the BPA, and other agricultural water quality related efforts in the future.

If there are any questions, please do not hesitate to contact me at (209) 883-8428 or via email at dcliebersbach@tid.org.

Sincerely,



Debra C. Liebersbach, P.E.
Water Planning Department Manager

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