

May 7, 2018

Karl E. Longley, PhD, Chair, and Members
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, Suite #200
Rancho Cordova, CA 95670

Via Electronic Mail: Jeanne.chilcott@waterboards.ca.gov; glenn.meeks@waterboards.ca.gov

SUBJECT: *Amendments to the Water Quality Control Plans for the Sacramento River and San Joaquin River Basins and the Tulare Lake Basin (Basin Plans) to Incorporate a Central Valley-wide Salt and Nitrate Control Program*

Dear Chair Longley and Members of the Board:

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to provide comments on the proposed basin plan amendments to incorporate a salt and nitrate control program for the Central Valley. CASA is a statewide association of local wastewater agencies engaged in advancing the recycling of wastewater into usable water, generation of renewable energy, and other valuable resources. Through these efforts we help create a clean and sustainable environment for Californians. As one of the earliest participants in the Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) process and a founding member of the Central Valley Salinity Coalition, we want to acknowledge the truly significant accomplishment the proposed amendments represent.

Years of hard work by the regional water board, its staff, the CVSC and numerous and diverse stakeholders have resulted in an ambitious and comprehensive Central Valley-wide Salt and Nitrate Management Plan (SNMP), and the Draft Amendments to the basin plans. This effort is unprecedented in California not only in its scope and scale, but also in its clear-eyed recognition that addressing these issues is a multi-decade undertaking that will require significant commitment, expense and sacrifice on the part of dischargers and users of Central Valley waters. The draft amendments provide a framework for protecting the valley's waters and avoiding the social and economic devastation that would occur with application of inflexible traditional command and control approaches. We commend the Board and its executive officer, Pamela Creedon, for the vision and leadership to see this major effort through to this important milestone.

CASA supports the detailed comments submitted by the Central Valley Salinity Coalition and supports adoption of the proposed amendments with the Coalition's recommended clarifying changes.

Sincerely,



Roberta L. Larson
Executive Director