



NCWA
Northern California Water Association

May 7, 2018

Karl E. Longley, Ph.S, Chair
Pamela Creedon, Executive Officer
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, Suite #200
Rancho Cordova, CA 95670

SUBJECT: *Comments on 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 Ms. Creedon:

As a long-time member of the Central Valley Salinity Coalition, the Northern California Water Association (NCWA), which is the Third-Party representing approximately 8300 Members of the Sacramento Valley Water Quality Coalition (SVWQC), appreciates the extraordinary commitment by the Central Valley Regional Water Quality Control Board (Regional Water Board) and senior management to successfully completing preparation of the comprehensive Central Valley-wide Salt and Nitrate Management Plan (SNMP). Given the size and scope of dischargers operating in the Central Valley Region it took careful deliberation to develop the proposed strategies and policies contained in the SNMP in the Draft Amendments to the Water Quality Control Plans for the Sacramento River and San Joaquin River Basins and Tulare Lake Basin to Incorporate a Central Valley-wide Salt and Nitrate Control Program (Draft Amendments) for the protection of drinking water stakeholders and agriculture.

The CV-SALTS is an important science, policy and regulatory planning process making significant progress in planning a sustainable future for Central Valley water users. Its technical studies (e.g., high resolution ambient groundwater quality maps (nitrate and TDS) for the Central Valley), the archetypes (e.g., Alta Irrigation District) and framework of policies will have far reaching and long lasting benefits to water quality.

The SVWQC has reviewed and supports the comments submitted by Tess Dunham on behalf of the Central Valley Salinity Coalition. In particular the SVWQC would like to emphasize the following comments in the letter:

- (p. 10) and (p. 151-152) – The Draft Staff Report includes references to surface water nutrient listings. Such references are inappropriate because surface water nutrient issues are not part of the Draft Amendments at issue here. Thus, the SVWQC supports the CVSC recommendation that nutrient listings and issues be removed from the Draft Staff Report, or at the very least, explain that surface water nutrient issues are not at issue in these Draft Amendments.
- (p. 10) – Under the surface water quality section for the Sacramento River Region, there is a statement that suggests that high levels of salinity are transported from the Sacramento River Region to Delta and other parts of the Central Valley. The SVWQC supports the CVSC view that this statement is misleading. As the data and information indicate, salinity levels in surface waters in the Sacramento River Region are low, and water quality is of high quality. As such, there are not significant levels of salinity being conveyed from the Sacramento River Region to the Delta or the rest of the Central Valley. The SVWQC supports the recommendation that this sentence be deleted.
- (p. 82) – The SVWQC agrees with the CVSC comment to add language “where appropriate and applicable” to GSAs participation and support of the P&O study. Further, the Draft Amendments should also be amended to state that GSAs in the Central Valley should also participate in nitrate management zones where appropriate and applicable. There are GSAs outside the Valley floor that have neither salinity nor nitrate water quality issues.

With respect to Boron, the SVWQC has had surface water exceedances in the Cache Creek area of Yolo County. In 2006 the Yolo County Flood Control and Water Conservation District documented the factors that influence water quality constituents including boron in the report "[Boron, Salinity, Nutrients and Dissolved Oxygen in the Irrigation Water within the Yolo County Flood Control & Water Conservation District.](#)" One of the main findings of the report is that “high levels of Boron occur naturally in the Cache Creek watershed.” (Page 6).

Yolo Flood Control and Water Conservation District also summarized information on Boron in *Natural Background Levels of Boron in the Clear Lake - Cache Creek Watershed: A Data Analysis and Literature Review (2007)* <http://www.ycfcwcd.org/documents/referenceboron.pdf>. And in 1955, the State Water Resources Control Board stated, “The quality of water in the Clear Lake-Cache Creek Basin, particularly with reference to boron, has long been the subject of much interest and speculation.” (State Water Resources Control Board, State of California. 1955. *Interim Report: Cache Creek Investigation*, Publication of State Water Resources Control Board.) Boron in Cache Creek is at natural background levels. The District (and predecessors) have been regularly monitoring Boron in Cache Creek since the 1930’s.

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It is requested that the Basin Plan included specific language on naturally occurring Boron in Cache Creek in the 'natural background concentration' section (Chapter 4). Boron in Cache Creek is a perfect example for this regulatory concept. In the Cache Creek area, a *Boron Reduction Study Work Plan* is not needed or an exception be necessary.

Section 4.2.7.3 *Recommendation* recommends modifying the existing Salinity Exception Program in the Basin Plans, grant exceptions for salinity constituents, nitrate and boron in non-NPDES program WDRs where it concludes that it is infeasible, impracticable or unreasonable to prohibit an otherwise non-compliant discharge to groundwater. To receive the exception the permittee will be required to prepare and implement a Boron Reduction Study Work Plan, or a boron based watershed management plan. (Page 284).

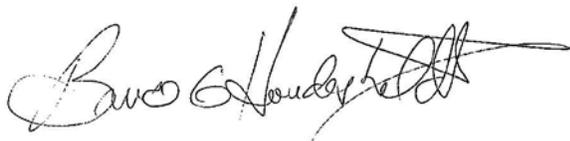
The SVWQC requests clarification that the language on Page 304 addresses the surface water exceedances for Boron

- The SRSJR Basin Plan states that, "*These objectives do not require improvement over naturally occurring background concentrations.*"
- Both the SRSJR and TLB Basin Plans include the following text within Chapter 4 of the Basin Plans (Policy for Application of Water Quality Objectives): *However, the water quality objectives do not require improvement over naturally occurring background concentrations. In cases where the natural background concentration of a particular constituent exceeds an applicable water quality objective, the natural background concentration will be considered to comply with the objective.*

and not require the preparation of and implementation of a Boron Reduction Study Work Plan, or a boron based watershed management plan. (Page 284).

The SVWQC is prepared to work with the Regional Water Board in achieving the over-arching management goals and priorities of the Salt and Nitrate Control Program to: 1) Ensure Safe Drinking Water Supply, 2) Achieve Balanced Salt and Nitrate Loading, and 3) Implement Long-Term, Managed Restoration of Impaired Water Bodies, through the framework established in the proposed Basin Plan Amendment.

Sincerely,



Bruce Houdesheldt
Director of Water Quality
Northern California Water Association

Cc: Patrick Pulupa, Executive Officer
Glenn Meeks

Jeanne Chilcott
David Cory

Anne Littlejohn
Tess Dunham