

SAN JOAQUIN VALLEY DRAINAGE AUTHORITY

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May 7, 2018

Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114
Attn: Pamela Creedon

Re: Comments of San Joaquin Valley Drainage Authority on the 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.

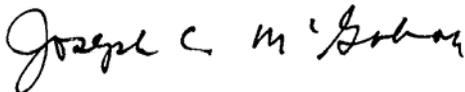
Dear Members of the Central Valley Water Board and Staff:

The San Joaquin Valley Drainage Authority (SJVDA) has participated in the Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) process since its inception and appreciated the leadership of the Water Board and its Staff in promoting a forum for stakeholders to develop viable solutions to the many challenges associated with drafting and implementing a Central Valley-wide Salt and Nitrate Control Program. The program the group has developed is a balanced package that protects water quality and offers a pathway to maintain viable agriculture in the Valley.

The SJVDA supports the comments submitted by the Central Valley Salinity Coalition (CVSC). The SJVDA would like to further emphasize the CVSC comment requesting that the Board elaborate on the process it will use to re-evaluate priority basins in the Nitrate Control Program. The Basin Plan language requires that “No Later than January 1, 2024, the Regional Board shall review the priorities listed in table N-1, and may adjust these priorities after considering water quality-based factors, and other relevant factors.” However this language does not fully explain the process the Board will use to make these re-evaluations, and it is extremely important that the process provide a mechanism for consideration of re-prioritization requests sooner than the January 1, 2024 deadline. In order to prevent unnecessary expenditures of limited resources, consideration of re-prioritizations should be allowed before Priority 2 basins are issued Notices to Comply.

The SJVDA appreciates your consideration of these comments and we look forward to working with the Board to implement this very innovative program.

Very truly yours,



Joseph C, McGahan
Watershed Coordinator