

March 16, 2009

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Via Hand Delivery and Electronic Mail

Joseph Simi
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

SUBJECT: COMMENT LETTER – UPSTREAM SJR SALINITY OBJECTIVES/TMDL

Dear Mr. Simi:

The Central Valley Salinity Coalition appreciates the opportunity to provide comments regarding the Notice of CEQA Scoping for the Upstream San Joaquin River Salinity Objectives and TMDL. CVSC is a nonprofit association formed to coordinate a broad-based stakeholder led effort to develop a salinity and nitrate management plan for the Central Valley Region, known as Central Valley Salinity Alternatives for Long Term Sustainability (CV SALTS).

As part of our work plan, CV SALTS will identify salt sources, evaluate beneficial uses, develop protective and attainable water quality objectives, and identify implementation options for various discharges and water users that rely on the Central Valley water supplies. We anticipate significant data gathering and analysis to support these activities. The effort will culminate in amendments to the Sacramento San Joaquin River and Tulare Lake Water Quality Control Plans. The outcomes of the CV SALTS program will not be limited to traditional regulatory components, and may involve changes in the management surface and groundwater supplies in order to achieve a salt balance for the Valley's basins. Given the interconnectedness of the watersheds, the implementation and effectiveness of the Basin Plans the San Joaquin River could be adversely affected if the approaches to salinity developed independently are incompatible. Therefore, it is critical that the Regional Water Quality Control Board's efforts to set upstream standards and TMDL limits be coordinated with, and consistent with, the CV SALTS initiative. In the context of CEQA scoping, the key is that the cumulative effects of the ongoing planning and regulatory efforts be accounted for to the greatest extent possible,

We urge the Regional Water Quality Control Board to integrate its planning for the Upstream San Joaquin River Standards with the CV SALTS effort as it proceeds. We plan to attend the scoping session on March 30th, and would be pleased to meet with you to discuss the CV SALTS initiative further.



Daniel B. Cozad, Executive Director
Central Valley Salinity Coalition Inc.

cc: Dr. Karl Longley, Chair, CV SALTS Executive Committee
Pamela Creedon, Executive Officer, Central Valley Regional Water Board
Mark Gowdy, State Water Board
Members, CVSC Board of Directors