



30 October 2017

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100, Sacramento, CA 95812  
1001 I Street, 24<sup>th</sup> Floor, Sacramento, CA 95814  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

VIA: Electronic Submission  
Hardcopy if Requested



RE: Proposed Approval of an Amendment to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins to Add Electrical Conductivity Water Quality Objectives in the San Joaquin River Between the Mouth of the Merced River and the Airport Way Bridge Near Vernalis

Dear Ms. Townsend, Members of the Board;

The California Sportfishing Protection Alliance (CSPA), California Water Impact Network (CWIN), and AquAlliance have reviewed the proposed Amendment to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins to Adopt Salinity Water Quality Objectives for the Lower San Joaquin River.

Given the press of other public proceedings (including California WaterFix), the Proposed Amendment's inadequate, cosmetic and self-serving modifications of the Draft Amendment and the seriously deficient and disingenuous response to our previous comments on the Draft Amendment: we respectfully resubmit our 14 April 2017 comment letter on the Proposed Amendment (attached to these comments). Those comments remain pertinent and applicable to the Proposed Amendment.

After refusing State Water Board directives to establish salinity limits upstream of Vernalis on the San Joaquin River for many years, the Central Valley Regional Board assigned the development of water quality objectives to an agricultural industry dominated stakeholder committee. The result is a poster-child of the pitfalls of special interests being tasked to develop water quality standards.

Contrary to the Proposed Amendment's claims, aquatic life beneficial uses are the most sensitive beneficial uses in the subject reach of the San Joaquin River and proposed salinity limits are clearly not protective of aquatic life. In fact, the Propose Amendment is not even protective of agriculture.

The absence of formal comments by the U.S. Fish and Wildlife Service, National Marine Fisheries Service and the California Department of Fish and Wildlife (DFW) is appalling. The

participation attendance sheets of the proceeding refute the spurious suggestion that anyone from the fishery agencies actively participated in development of the water quality objectives.

The Proposed Amendment creates a permanent sacrifice zone of aquatic life in the lower San Joaquin River in order to justify the continued discharge of prodigious quantities of salts from eastside dischargers. The salinity limits reflect what is acceptable to dischargers, not what is protective of the resource. As such, they are legally indefensible, scientifically unjustifiable and morally reprehensible.

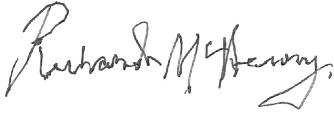
We encourage the State Board to either establish protective salinity limits on its own motion or, alternatively, to send the Proposed Amendment back to the Central Valley Regional Board with direction to establish limits protective of beneficial uses rather than dischargers.

Thank you for considering these comments. If you have questions or require clarification, please don't hesitate to contact us.

Sincerely,



Bill Jennings, Executive Director  
California Sportfishing Protection Alliance



Richard McHenry, Director of Permits & Compliance  
California Sportfishing Protection Alliance



Carolee Kreiger, Executive Director  
California Water Impact Network



Barbara Vlamis, Executive Director  
AquAlliance

Attachment: CSPA et al. 14 April 2017 Comments on Basin Plan Amendment for Salinity