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October 30, 2017

VIA ELECTRONIC MAIL



Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, California 95814-2000
commentletters@waterboards.ca.gov

Re: Basin Plan Amendment to Add Electrical Conductivity Water Quality Objectives in the San Joaquin River between the mouth of the Merced River and Airport Way Bridge near Vernalis

Dear Ms. Townsend:

On behalf of Stockton East Water District (Stockton East), we appreciate the opportunity to comment on the proposed approval by the State Water Resources Control Board (State Water Board) of the Regional Water Quality Control Board, Central Valley Region (Regional Board) Basin Plan Amendment to Add Electrical Conductivity Water Quality Objectives in the San Joaquin River between the mouth of the Merced River and Airport Way Bridge near Vernalis (Basin Plan Amendment). Over the past twenty years, Stockton East has participated in countless Regional and State Water Board meetings, workshops and processes related to salinity in the San Joaquin River and has been advocating for the adoption of salinity water quality objectives upstream of Vernalis.

Since its formation in 2010, Stockton East has participated in the Lower San Joaquin River (LSJR) Committee, a subcommittee of CV Salts. I, along with David Cory of the San Joaquin Valley Drainage Authority, acted as Co-Chairs for the LSJR Committee since the fall of 2012. Hundreds of hours of time by the diverse group of Stakeholders that make up the LSJR Committee have been invested into development of the proposed salinity water quality objectives and the plan of implementation. Specifically, the Committee sought the assistance of the major agricultural diverters on the San Joaquin River to ensure that any objective proposed would be protective of agriculture in the region.

One of the principle objectives of the LSJR Committee besides developing the salinity water quality objective that would be protective of beneficial uses on the Lower San Joaquin River, was the need to ensure that implementation of the selected salinity water quality objective would reduce New Melones water quality releases. Regional

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Board staff acknowledges that the Vernalis WQO has been met since 1995 by Reclamation's releases of high quality water from New Melones Reservoir on the Stanislaus River to dilute the salinity laden water coming down the San Joaquin River. The LSJR Committee believes based on the modeling done as part of this process that the proposed salinity water quality objective and the implementation plan will achieve this desired outcome.

Stockton East supports the State Water Board's approval of the Basin Plan Amendment and we appreciate the opportunity to comment.

Very truly yours,



KARNA E. HARRIGFELD
Attorney-at-Law

cc: Scot A. Moody