



March 16, 2009

Via Hand Delivery and Electronic Mail

Anne Short
 State Water Resources Control Board
 Division of Water Rights
 P.O. Box 2000
 Sacramento, CA 95812-2000


SUBJECT: COMMENT LETTER – SOUTHERN DELTA SALINITY AND SAN JOAQUIN RIVER FLOW NOP

Dear Ms. Short:

The Central Valley Salinity Coalition appreciates the opportunity to provide comments regarding the Notice of Preparation for the Southern Delta Salinity and San Joaquin River Flows. 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 and the Bay Delta Plan could be adversely affected if the approaches to salinity developed independently are incompatible. Therefore, it is critical that the State Water Board's efforts to update the Bay-Delta Plan 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 State Water Board to integrate its planning for the Southern Delta and San Joaquin River 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

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