

November 10, 2016

Public Comment
Bay-Delta Phase II Working Draft Report
Deadline: 12/16/16 12 noon

Via Electronic Mail

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000




SUBJECT: COMMENT LETTER – BAY-DELTA PHASE I SED AND PHASE II WORKING DRAFT SCIENCE REPORT

Dear Ms. Townsend:

The Central Valley Salinity Coalition appreciates the opportunity to provide comments regarding the Bay-Delta Phase I SED for Southern Delta Salinity and San Joaquin River Flows and the Phase II Working Draft Science Report for the Sacramento River and Tributaries, Eastside Streams to the Delta, Delta Outflow and Interior Delta Operations. CVSC is a nonprofit association formed to coordinate a broad-based stakeholder led effort that has developed a Salinity and Nitrate Management Plan (Salt and Nitrate 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 identified salt sources, affected beneficial uses, information on protective and attainable water quality objectives, and identified implementation options for various water users that rely on the Central Valley water supplies. Significant data gathering and analysis was performed to support these activities. In 2017, the Central Valley Regional Water Quality Control Board will prepare and approve amendments to the Sacramento/San Joaquin River and Tulare Lake Basins Water Quality Control Plans. The outcomes of the CV SALTS program are not limited to traditional regulatory components, and involve changes in the management of surface and groundwater supplies in order to plan for a long term 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 Salt and Nitrate Plan. In the context of Delta water quality objectives and flow requirements, it is critical that the Board consider the cumulative effects on the tributary areas and the planning and regulatory changes in the CV-SALTS process to the greatest extent possible.

We urge the State Water Board to carefully evaluate and integrate CV-SALTS analysis and recommendations when considering flow and salinity objectives for the Southern Delta and San Joaquin River.


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

cc: Dr. Karl Longley, Chair, Central Valley Regional Water Board
Pamela Creedon, Executive Officer, Central Valley Regional Water Board
Members, CVSC Board of Directors