



San Joaquin River Group

- Modesto Irrigation District
- Turlock Irrigation District
- South San Joaquin Irrigation District
- San Joaquin River Exchange Contractors

716 Valencia Ave
Davis, CA 95616-0153
(530) 758-8633
(530)297-2603-Fax

- Merced Irrigation District
- Oakdale Irrigation District
- Friant Water Authority
- City and County of San Francisco

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Jay Simi

Water Resources Control Engineer

California Regional Water Quality Control Board, Central Valley Region

11020 Sun Center Drive #200

Rancho Cordova, CA 95670-6289

SUBJECT: Amendments to the Water Quality Control Plan to Establish a Drinking Water Policy for Surface Waters of the Sacramento-San Joaquin Delta and Upstream Tributaries

The San Joaquin River Group Authority (SJRGGA) appreciates the opportunity to comment on the proposed Basin Plan Amendment (BPA) to establish a drinking water policy to protect source water quality of the surface waters of the Sacramento-San Joaquin Delta and Upstream Tributaries. Several of the SJRGGA members provide municipal and domestic water supplies to various users. Protection of the source water for these supplies is extremely important in maintaining the usability of those supplies. We are supportive of the staff approach which focuses on protecting drinking water supplies by using a problem solving approach to identify and eliminate contaminant sources that may impact those drinking water supply intakes. The approach described in the staff report for *Cryptosporidium* and *Giardia* which triggers a process for addressing any exceedances of the triggers is the correct type of approach that should be used in problem solving in water quality protection. There should be consideration of expanding the use of this approach to other drinking water criteria

The SJRGGA however cannot support the present BPA proposal as it makes an existing problem, not associated with this amendment, worse. The staff proposal applies the policy and related monitoring to all waterbodies with the municipal water supply (MUN) beneficial use. In the 1990s, the Regional Board applied a blanket MUN designation to all waterbodies in implementing the State Water Board's Sources of Drinking Water Policy. This blanket designation resulted in the MUN beneficial use being applied to all Ag canals and drains in the San Joaquin River Basin.

Regional Board staff, at the direction of the Board, is working to correct this miss-application as it seriously jeopardizes the ability of irrigated agriculture to meet the intent of the irrigated lands program. The present dilemma also seriously limits the ability of water and drainage districts and agencies to effectively manage recycled water and stormwater.

The adoption of the proposed BPA would again apply a similar policy to all these canals and drains making an existing dilemma worse. We urge the staff and the Board to modify the policy by a declaration that Ag water supply canals and Ag drains in the San Joaquin River Basin are not considered tributaries under this policy or specifically exclude Ag water supply canals and Ag drains from the policy unless they are presently providing a source of municipal or domestic water supply. If an exclusion were written into the policy, the SJRGGA would be supportive of

the policy being applied to all natural water bodies in the San Joaquin River Basin which supply tributary water to the San Joaquin River and Delta.

The primary concern with the policy being applied to canals and drains is the requirement to monitor. The costs to conduct monitoring in all the canals and drains in the San Joaquin River Basin would be huge. These costs are not presented in Section 4.5.4 "Economic Consideration".

Section 4.5.6 (page 40) of the staff report states that none of the alternatives would restrict the development or use of recycled water. If the proposed policy is applied to irrigation canals and drains, this would seriously restrict use of recycled water and needs to be analyzed.

Page 55 of the staff report shows the economic costs of implementation of the proposed policy. These costs do not show the costs that would be involved if the policy is applied also to Ag canals and drains, especially if the monitoring proposed in the policy is applied also to canals and drains in the San Joaquin River Basin.

Again the SJRGA is supportive of the proposed BPA language and the concepts of using the problem solving approach if the language is modified to reflect that the policy is not applicable to Ag canals and Ag drains, unless one of these is specifically carrying municipal and domestic supply water.

If you have any questions regarding our comments, please contact me.

A handwritten signature in black ink that reads "Dennis Westcot". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Dennis W. Westcot
Project Administrator

cc: SJRGA Managers