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October 29, 2017

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



Subject: Basin Plan Amendment 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:

Contra Costa Water District (CCWD) appreciates the opportunity to comment on the Basin Plan Amendment 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. CCWD serves drinking water to 500,000 people and industries in central and eastern Contra Costa County and relies entirely on the Sacramento-San Joaquin Delta (Delta) for its water supply. CCWD, through the California Urban Water Agencies (CUWA), has participated in the Central Valley – Salinity Alternatives for Long-Term Sustainability (CV-SALTS) process since its inception. Throughout the stakeholder process, CUWA has provided comments on various drafts of CV-SALTS documents and related Basin Plan Amendments. Although some of our previous comments were considered, our substantive comments on downstream water quality and source water protection remain unaddressed.

The Basin Plan Amendment proposes an electrical conductivity (EC) objective of 1,550 $\mu\text{S}/\text{cm}$ as a 30-day running average in the Lower San Joaquin River (LSJR), except during Extended Dry Periods, when the objective will be 2,470 $\mu\text{S}/\text{cm}$ as a 30-day running average and 2,200 $\mu\text{S}/\text{cm}$ as an annual average. We do not support these EC objectives for the LSJR for the following reasons:

1. **The impacts of increased salt loads to downstream water quality** – The proposed EC objectives in the Basin Plan Amendment are much higher than the State Water Resources Control Board’s Decision 1641 (D1641) water quality objectives for San Joaquin River at Vernalis, which are 700 $\mu\text{S}/\text{cm}$ for April-August and 1,000 $\mu\text{S}/\text{cm}$ for September-March as maximum 30-day running average of mean daily EC. Therefore, the proposed EC objectives in the LSJR are not protective of downstream beneficial uses and water quality in the Delta. Although the Central Valley Regional Board staff stated in their response to comments that “the establishment of these WQOs will not impact the south Delta because the Vernalis objectives will continue to be met”¹, there was no scientific analysis

¹Response to Comments on Basin Plan Amendments to Establish Salinity Water Quality Objectives for the Lower San Joaquin River.

https://www.waterboards.ca.gov/centralvalley/board_decisions/tentative_orders/1706/20_lsjr_bpa/16_lsjr_bpa_rtc.pdf

supporting this statement. Salt is a conservative constituent. Salt loads accumulated along the San Joaquin River are conveyed into the Delta without dissipation, affecting the drinking water quality for 23 million Californians, agricultural water uses for thousands of acres of farms, industrial water uses for important sectors of the economy, and environmental water uses for a variety of endangered species. The Board staff did not explain how the salinity along the LSJR would be reduced to meet the Delta and Vernalis EC objectives.

2. **Fresh water is required to dilute salt concentration** – Unless desalination plants are built, dilution is the only feasible way to reduce salinity from 1,550 $\mu\text{S}/\text{cm}$ upstream of Vernalis to 1,000 $\mu\text{S}/\text{cm}$ at Vernalis. Historically, there has already been a need for water releases from New Melones Reservoir to meet the Vernalis EC objective. Although it should be the dischargers' responsibility to ensure that downstream beneficial uses are protected from discharge activities, it has been at the expense of the Bureau of Reclamation (Reclamation) and Central Valley Project contractors to ensure that the Vernalis EC objective is met through releases from New Melones. By establishing the EC objectives upstream of Vernalis to be more than 50% higher than those at Vernalis, the proposed Amendment would only exacerbate the unreasonable shift of responsibilities from dischargers to Reclamation.
3. **The inappropriate use of the Grassland Bypass Project (GBP) to justify the proposed EC objectives** – The Central Valley Regional Board staff stated in their response to comments that “the river salinity will be lower than current and historic river salinity after full implementation of the preferred alternative, which includes full implementation of the Grassland Bypass Project (GBP)”¹. CCWD applauds the accomplishments achieved so far by the GBP in reducing salt and selenium loads into SJR, looks forward to its successful completion by 2019, and would welcome more projects like the GBP to identify and implement in-Valley solutions for drainage management issues. However, the reduction in salt loads to the SJR due to the GBP was not designed to offset water quality degradation from other uncontrolled discharges. The anticipated success of GBP in reducing salt loads into the San Joaquin River and Delta should not be a reason to establish EC objectives that would allow an increase in salt loads from other discharges.
4. **Unreasonable assumption that reducing salt loads by dischargers is infeasible** – The Staff Report² concluded that a better water quality objective, such as Project Alternative #6 to establish 1,010 $\mu\text{S}/\text{cm}$ as the EC objective at LSJR (which is more consistent with the Vernalis EC standards), is not feasible to implement and may constraint water conservation efforts. This conclusion implicitly assumed that current discharge activities could not be improved, which is unreasonable. The GBP provides examples of practices that dischargers could implement to reduce salt loads, including improvements in irrigation efficiency, drainage collection and reuse; these are practices which benefit both

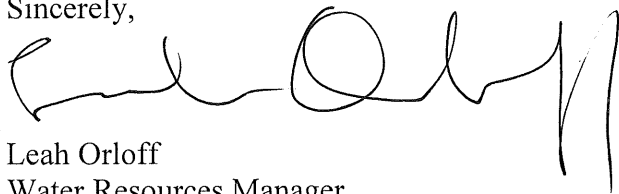
²Final Staff Report: Proposed Amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins to Establish Water Quality Objectives in the Lower San Joaquin River. https://www.waterboards.ca.gov/centralvalley/water_issues/salinity/upstream_salt_boron/201706_bp_amends_lsjr_staffrpt.pdf

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growers/dischargers and downstream water users. In addition, promotion of water conservation should be conditioned upon a reasonable protection of the downstream water quality and beneficial uses. Dischargers should make continuous efforts to maintain the highest water quality consistent with the maximum benefit to the people of the State.

Overall, the water quality objectives should be established to protect source water, not to create more assimilative capacity for discharges. If you have any questions, please do not hesitate to call me at (925) 688-8083.

Sincerely,

A handwritten signature in black ink, appearing to read 'Leah Orloff', written in a cursive style.

Leah Orloff
Water Resources Manager

YL/LHS:wec

²Final Staff Report: Proposed Amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins to Establish Water Quality Objectives in the Lower San Joaquin River. https://www.waterboards.ca.gov/centralvalley/water_issues/salinity/upstream_salt_boron/201706_bp_amends_lsjr_staffrpt.pdf