

## SOUTHERN SAN JOAQUIN VALLEY WATER QUALITY COALITION

· Kaweah River Sub-Watershed  
Kern River Sub-Watershed  
Kings River Sub-Watershed  
Tule River Sub-Watershed  
4886 E. Jensen Avenue  
Fresno, California 93725  
(559)237-5567

February 1, 2010

Central Valley Regional Water  
Quality Control Board  
1685 "E" Street  
Fresno, CA 93706

Attn: Mr. Lonnie Wass

Re: Tulare Lake Basin Water Quality Control Plan, Triennial Review

Dear Mr. Wass:

The Southern San Joaquin Valley Water Quality Coalition (Coalition), representing the Kings River Basin, Kaweah River Basin, Tule River Basin and Kern River Basin, along with uncontrolled intermittent streams of the Southern San Joaquin Valley, continues to be interested and engaged in the Triennial Review process of the Water Quality Control Plan for the Tulare Lake Basin.

The Coalition appeared in the 13 September 2007 Central Valley Regional Water Quality Control Board (Regional Board) Public Workshop, providing both written and oral testimony. Subsequent to the Public Workshop, the Coalition has transmitted comments, dated 20 May 2008, on the Regional Board's list of water quality issues, and conducted meetings with the Regional Board staff 24 July 2008 and 19 January 2009. The Coalition concurs with the Basin Plan Issues that have been identified by the Regional Board staff as high priority for the current Triennial Review of the Tulare Lake Basin Plan as follows:

### Beneficial Use Designations

The Coalition supports consideration of the dedesignation of MUN, IND, PRO, REC1, WARM and COLD for surface waters of reaches of Valley floor streams that are intermittent and typically dry or above a certain elevation. The Coalition is willing to work with the Regional Board staff in the development of use attainability analyses for such dedesignations.

### Wetlands

The Coalition is concerned that State and Federal agencies are attempting to use Wetlands as a means for control under Section 404 of the Federal Clean Water Act.

The Coalition also requests the opportunity of involvement in the development of the statewide wetland and riparian area policy as envisioned under SWRCB Resolution No. 2008-0026.

### Salt and Nitrate Management Plan

The Coalition has representatives attending the CV-Salts technical and executive committee meetings and will continue to participate in the program.

The Coalition will work with the Regional Board staff in coupling data bases for determination of salt and nitrate levels in the surface and groundwater of the Tulare Lake Basin.

The Coalition supports the goal of the CV-Salts program of maintaining a healthy environment and a good quality of life for all Californians by protecting our most essential and vulnerable resource, WATER, but at the same time develop the means and procedures necessary to maintain California's most important industry, AGRICULTURE.

### Groundwater Assessment and Control Programs

The primary sources of nitrate in groundwater needs to include natural sources, rocks and other soil materials that may react and provide the majority of the nitrate in groundwater.

The Tulare County Water Commission created a Nitrate Subcommittee for the determination of the level of nitrate in groundwater throughout the County and to identify the source(s) of the nitrate as well as develop a resolution of providing acceptable drinking water within areas of high nitrate.

The Coalition understands the Central Valley Regional Water Quality Control Board has formed a Groundwater Monitoring Advisory Workgroup (GMAW) for the assessment of the quality of groundwater. The Coalition would like to have the opportunity of being active in the GMAW.

As a result of the meeting of 19 January 2010, the Coalition understands the Tulare Lake Basin Water Quality Control Plan will not be amended for the monitoring of groundwater.

### Electrical Conductivity Effluent Limit

The Coalition understands the Basin Plan will not be amended for the electrical conductivity effluent limit for municipal and domestic discharges, and the limit will continue to be source water plus 500 umhos/cm. The Coalition further understands that the electrical conductivity discharge limit for oilfield produced water discharges to land of 1000 umhos/cm. will not be altered in the current triennial review of the Basin Plan.

State Water Board Collaboration

The Coalition understands the State Water Resources Control Board is developing a policy on a statewide level for many programs itemized as follows:

- 1.) Anti-Degradation Policy
- 2.) Aquifer Storage and Recovery Policy
- 3.) Bio-indicator Development
- 4.) Cadmium objective and implementation policy
- 5.) Chlorine residual objectives and implementation policy
- 6.) Mercury offset policy
- 7.) Methylmercury objectives
- 8.) Onsite waste water treatment regulations/waiver
- 9.) Toxicity control provisions for the SIP

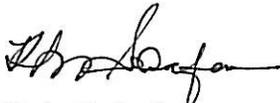
The Coalition would like to be included in the development of such policies, particularly with respect to the anti-degradation policy, the aquifer storage and recovery policy and the onsite waste water treatment regulations/waiver.

The Coalition appreciates the continued open relationship with the Regional Board staff, the opportunity of transmitting comments on the issue list and work plan for the 2007 Triennial Review of the Water Quality Control Plan for the Tulare Lake Basin, and the opportunity of being more involved in the development of policy for surface and groundwater monitoring and control in the Tulare Lake Basin.

Should the Regional Board, as a result of the public hearing, consider additional issues for the 2007 Triennial Review work plan, the Coalition would appreciate being informed thereof.

The Coalition also intends to have representation in the public hearing of March 17/18/19, 2010.

Very truly yours,



R. L. Schafer

RLS/mep

cc: William Thomas	Dennis Keller
David Orth	Mark Larsen
David Cone	Nick Gatti
Rick Hoelzel	Sean Geivet
Dennis Tristao	