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Technical Committee Comments on the Draft Eastern San Joaquin River watershed WDR and MRP Governing Discharges from Irrigated Agriculture

Mr. Karkoski,

On May 17th the Technical Advisory Committee convened a conference call to review the draft ESJR WDR and MRP. This review provided comments and subsequent meetings on May 30th and June 26th made additional changes. The following are suggestions presented by Committee members as revised:

CV-SALTS is working to develop a salt and nitrate management plan for the entire Central Valley. Stakeholder participation in the process is essential to developing a robust plan. Therefore CV-SALTS encourages all irrigated lands to participate in the process. Participation can include representation in the CV-SALTS process as well as the willingness to provide needed data to the group to be used to develop a more effective salt and nitrate management plan.

Because of the early stage of the CV-SALTS salt and nitrate management plan, the exact data needed from various regions for the plan have not been identified. However we can be certain that CV-SALTS will need water quality and water supply information from agricultural water users during the development of the plan. Therefore the CV-SALTS Executive Committee requests that the Regional Board encourage irrigated agriculture to actively participate in the CV-SALTS process and that agricultural interests be responsive to future data requests from CV-SALTS as these needs are identified.

We appreciate the opportunity to comment on the technical questions and issues presented by Regional Board staff.

Nigel Quinn
Chair, CV-SALTS Technical Advisory Committee

Jeff Willett
Vice Chair, CV-SALTS Executive Committee

cc:

Pamela Creedon, Executive Officer, Central Valley Regional Water Quality Control Board

Technical Committee Recommendations for Changes/Additions to the Draft
Eastern San Joaquin River watershed WDR and MRP Governing Discharges
from Irrigated Agriculture

On May 17th the Technical Advisory Committee convened a conference call to review the draft ESJR WDR and MRP. This review provided comments and subsequent meetings on May 30th and June 26th made additional changes. The following are suggestions presented by Committee members as revised:

1. Water Budget

To assist with the understanding of salinity, and development of nitrate budgets, consider utilizing high-level regional water balance. At least a total for the region or link to the CV-SALTS Water Balance Budgets created for the Initial Salt and Nutrient Management Plan Conceptual Model work. This will assist with consistent estimation of an Annual Regional Water Budget to support the development of appropriate management alternatives.

2. Nitrogen Budget Template

Propose a template for nitrogen budget worksheet that can include some standardized assumptions and methodology as appropriate across Coalitions allowing CV-SALTS to make use of the information as developed. Utilize a scientifically defensible and where possible common methodology in the template. Ensure that data from the templates are available to CV-SALTS

3. Time Schedules are Appropriate for Compliance

The 10-year timeline identified for compliance from SQMP or GQMP submission especially in groundwater, is not likely to be achievable. A longer schedule is likely appropriate for full compliance.

4. Monitoring Parameters

Total Dissolved Solids (TDS) is recommended for consideration for addition to the compounds monitored, coalitions should be actively participating in CV-SALTS. Participation will increase salinity information and potential management options.

In specific locations where it is established that anthropogenic levels above background are common and where there are non-natural hydrogeological conditions exist the Committee recommends additional monitoring for salt related constituents to assist in characterization and identifying solutions. Examples could include sodium, chloride and other dominant ions/anions).

5. MRP Table 3. Trend Monitoring Constituents

All coalitions should be actively engaged in the CV-SALTS initiative and should coordinate with CV-SALTS related to trends of salt constituents and nitrate.

6. Frequency and Removal

The process for reducing frequency or removing constituents from the analyte list is necessary and should be proposed in the plan. Analytes should be reduced in frequency or removed from monitoring when a stable trend is determined; a contaminant is no longer present in regulatory concentrations or other appropriate situations. Revisions should consider salinity needs; currently the document appears to focus more on nitrate and pesticides.