
Central Valley Regional Water Quality Control Board

29 March 2021

David Cory
Chair
Central Valley Salinity Coalition
1501 Olive Avenue
Redlands, CA 92373

PHASE I WORKPLAN FOR THE PRIORITIZATION AND OPTIMIZATION STUDY FOR THE CENTRAL VALLEY SALT CONTROL PROGRAM

Dear Mr. Cory,

Thank you for the submission of the Phase I Workplan for the Prioritization and Optimization (P&O) Study (Phase I Workplan) dated 14 January 2021. This Workplan is a requirement of Phase I of the Alternative Salinity Permitting Approach of the Central Valley Salt Control Program.

The Central Valley-wide Salt and Nitrate Control Program was adopted by the Central Valley Regional Water Quality Control Board (Central Valley Water Board) on 31 May 2018 with Resolution R5-2018-0034. It was approved by the State Water Resources Control Board (State Water Board) on 16 October 2019 with Resolution 2019-0057, with the stipulation that targeted revisions directed by State Board were required. The original Salt and Nitrate Control Program was amended into the Water Quality Control Plans for the Sacramento River and San Joaquin River Basins and the Tulare Lake Basin (Basin Plans), effective 17 January 2020. The revisions directed by the State Water Board were incorporated into the Salt and Nitrate Control Program and adopted by the Central Valley Water Board 10 December 2020 with Resolution R5-2020-0057. These revisions are currently pending approval by the State Water Board, Office of Administrative Law, and the U.S. Environmental Protection Agency.

The Phase I Workplan submitted adequately addresses the current Salt Control Program requirements in the Basin Plans. When the revisions to the Salt Control Program are approved and amended to the Basin Plans, any applicable revisions should be incorporated into the Phase I Workplan. This includes the revision of Goal 2 for the Salt Control Program, which is proposed to change from achieving balanced salt loading to achieving a cessation of exceedances of salinity water quality objectives.

KARL E. LONGLEY SCD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

Additionally, though not listed specifically in the timetables of the Phase I Workplan, but discussed briefly in the text (Section 1.4.2, page 4-4), this letter confirms that annual briefings on the P&O Study will be provided to the Central Valley Water Board that will include status updates of the study, key findings and recommendations. This letter also confirms that adaptive management will be crucial to the P&O Study, as discussed in the Phase I Workplan Section 2.1.1.6, page 5-3, and encourages frequent evaluation of the study aspects based on knowledge gained during the process. Changes to the Phase I Workplan may require Central Valley Salinity Coalition, CV-SALTS Executive Committee, and Central Valley Water Board Executive Officer approval.

Finally, the effort included in the Phase I Workplan to define water quality objectives for salinity constituents protective of beneficial uses in select archetype areas is an important part of the end goal of salt reduction in the Central Valley. However, completing this effort must not be at the expense of other goals of the study in finding solutions to the uncontrolled degradation currently occurring from salt accumulation. The tasks correlated with defining salinity limits should be conducted in parallel with the equally important tasks of evaluating physical and non-physical projects that will result in effective reduction of salt in the Central Valley, especially given the time constraints and limited resources of the P&O Study.

The Central Valley Water Board appreciates the work conducted by the Central Valley Salinity Coalition thus far and looks forward to its continued collaboration to reduce salt in the Central Valley.

Please contact Jennifer Fuller if you have any questions at (916) 464-4646 or Jennifer.Fuller@waterboards.ca.gov.

Sincerely,

Patrick Pulupa
Executive Officer