

October 29, 2009

Via US Mail and Electronic Mail

Pam Buford, Senior Environmental Scientist
Central Valley Regional Water Quality Control Board
685 E Street
Fresno, California 93706

SUBJECT: CV-SALTS Technical Advisory Committee and Executive Committee Responses to the Central Valley Regional Water Quality Control Board Groundwater Strategy Question and process

Dear Ms. Buford;

The CV-SALTS Technical Advisory Committee (TAC) and Executive Committee agreed at the August 19, 2009 meeting to provide you with formal comments to questions that you presented at the July 14, 2009 TAC and Executive Committees. We appreciate the opportunity to work with you in developing a process review by the CV-SALTS TAC and Executive Committee that will provide substantive, timely technical information, and understanding of where groundwater projects interact with the development of a Central Valley Salinity and Nitrate Management Plan.

On July 14th you made a presentation to the TAC and Executive Committee on Board direction and your stakeholder efforts and meetings to develop a long term Groundwater Strategy. You submitted the following questions to the committees with the goal of receiving immediate feedback and suggestions:

How should [Regional Board groundwater] strategy development be coordinated with and informed by CV-SALTS?

Process and Program

Appropriate protection of groundwater quality is essential to the management of salinity. The Regional Board should utilize the methods that have been developed by CV-SALTS for development of a strategy for groundwater quality management. The use of a stakeholder task force or committee of those that manage groundwater and stakeholders from the CV-SALTS programs would be effective. As the strategy is developed, its implementation at least for salinity and nitrate should be through CV-SALTS. Among the members of the CV-SALTS stakeholders are users, managers and dischargers that effect groundwater and are concerned with the implementation of the strategy. Additionally these stakeholders have diverse perspectives on the role of the Regional Board in control of groundwater supplies and so are a useful focus group or test market for the strategy but more importantly the implementation.

Understanding and Coordination

CV-SALTS can help the Board understand the stakeholders' interests and concerns with potential strategies and help coordinate the review of the draft strategy. While focused on Salt and Nitrate, significant concern is placed on the coordination of all programs many of which are connected to groundwater.

Coordination of the groundwater strategy development with salt and nitrate issues is best done through ongoing coordination with CV-SALTS. CV-SALTS initiative has documented a coordination process and matrix of programs with which regular coordination is planned and executed. The groundwater Strategy development process should utilize this process in development and implementation.

Implementation of salt and nitrate management strategy elements are likely to have secondary effects on the quantity of water available for use and the quality and availability of surface water for recharge. These areas which may significantly affect locally managed groundwater will be controversial and the stakeholders in the CV-SALTS initiative can be valuable resources achieving the water quality goals without disrupting programs in well managed groundwater basins.

Sustainability, Regulatory Clarity and Cooperation Goals

Both the CV-SALTS initiative and the Groundwater strategy must have as primary goals the sustainability of the Central Valley's waters. Groundwater resource strategies should help bring clarity and simplify quality issues related to conjunctive use and groundwater storage. Finally, there should be close cooperation with the State Water Resources Control Board, the Department of Water Resources, the US Bureau of Reclamation and the Integrated Regional Water Management Programs within the Central Valley.

Forward Looking, Long Term and Science Based

The strategies developed for groundwater should be focused on future groundwater quality over the long term, because changes in groundwater often occur over the long term improvements will as well. Short term issues are likely already under regulatory control.

Currently lacking, but necessary for a successful groundwater strategy is comprehensive groundwater monitoring information from across the Central Valley. This information is critical to identify subregional, regional, medium- to long-term water quality trends, especially near the water table (recharge), and the ability to ensure that management is effective. Given the large-scale distribution of salt and nitrate sources coordination of Central Valley groundwater monitoring is critical to the success of any strategy developed therefore close coordination with CV-SALTS initiative will be needed.

Conclusion

In conclusion, we hope you and the Board continue close coordination with the CV-SALTS initiative as we develop the Central Valley Salinity and Nitrate Management Plan.

Sincerely,



Mona Shulman

Chair, Executive Committee CV-SALTS