

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION**

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comment

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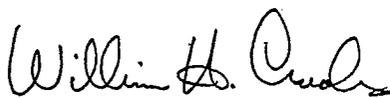
WORKSHOP ON THE CALFED ACTION CATEGORIES

The following are comments on the CALFED proposed action categories discussed at the October 12th workshop. South Delta and export water quality is closely tied to the problem of salt management in the San Joaquin Valley. The actions proposed by CALFED must be structured around the need to manage the present and future salt loads from urban, industrial, agricultural and wetland sources within the San Joaquin Valley. The Water Quality Control Plan for both the San Joaquin River Basin and the Tulare Lake Basin identify the best technical solution as being a separate facility to move salts, from all sources, to a safe disposal point outside the basin. Such a discharge must be done under an NPDES permit that ensures all toxic substances are removed prior to discharge and that there is no impact to beneficial uses. We recommend CALFED also consider this solution as part of the final package for improvement of water quality in the Bay-Delta system.

Water users within the San Joaquin River Basin are trying to manage salt in the surface water system with significant impacts to beneficial uses resulting. The primary reason for the impacts is the lack of dilution flows for the present salt loads. Removing present and future salt sources from the river and discharging them through a separate facility would reduce the total load to the Delta and significantly improve water quality in the lower San Joaquin River, the South Delta and the state and federal water projects.

Salt management in the Tulare Lake Basin is also closely linked to future Delta water quality and exports. The Basin is the largest groundwater source in the state yet it has no natural drainage outlet for salt. At present, salt remaining from water use by agriculture and the rapidly expanding urban population is moving to the groundwater. The groundwater has become a salt sink. Eventually this groundwater will become too salty for agricultural and urban uses and this may prompt greater demands on Delta diversions to replace these lost supplies. Maintaining the groundwater quality in the Tulare Lake Basin can be accomplished by salt export.

The salt management issue is a valley wide problem and goes beyond simply being an agricultural drainage disposal problem. Storing salt in the valley will only make future water management decisions more difficult. In crafting a solution for the water quality problems in the Delta, we recommend CALFED consider salt export through a separate facility as part of that long-term solution. If you have any questions, please call me at (916) 255-3039 or if your staff have questions, please call Dennis Westcot at (916) 255-3087.


WILLIAM H. CROOKS
Executive Officer

cc: Regional Board Members
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