



CVCWA

CENTRAL VALLEY CLEAN WATER ASSOCIATION

Formerly the Central Valley Wastewater Manager's Association

Representing Over Forty Wastewater Agencies

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Via Electronic and U.S. Mail

September 8, 2004

Arthur G. Baggett, Jr., Chair, and Members
State Water Resources Control Board
1001 I Street
Sacramento, CA 96814

Electronic Mail: dirvin@swrcb.ca.gov

**SUBJECT: Comment Letter – September 14, 2004 Workshop: Item Number 1:
 Consideration of a Proposed Resolution Adopting the Draft Staff Report on the
 Periodic Review of the 1995 Water Quality Control Plan for the San Francisco
 Bay/Sacramento-San Joaquin Delta Estuary**

Dear Chairman Baggett and Members of the Board:

The Central Valley Clean Water Association (CVCWA) is pleased to provide comments regarding the Triennial Review of the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary. The Central Valley Clean Water Association was incorporated earlier this year as a non-profit association. CVCWA consists of 45 local public agencies located within the Central Valley Region that provide wastewater collection, treatment and water recycling services to millions of Central Valley residents and businesses.

While we recognize that flows and other water supply issues will be a major focus of the Bay Delta Plan review, CVCWA is interested in the potential development of water quality objectives for the Delta. CVCWA is actively participating in the effort currently underway within the Central Valley Region to develop water quality objectives for drinking water constituents of concern for the Sacramento and San Joaquin River Basins. The Central Valley Regional Water Quality Control Board has outlined a technically sound and thoughtful approach to developing a policy for the protection of the drinking water beneficial use in surface waters within the region. The significant stakeholder effort already underway helps to ensure that various perspectives and areas of technical expertise will be considered during the development process.

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It is imperative that any effort undertaken by the SWRCB to develop objectives for the Bay Delta be closely coordinated with the Central Valley Regional Board's process. Significant resources are being expended by the Regional Board, drinking water purveyors and the wastewater community to gather monitoring data and conduct detailed technical studies that will form the foundation for subsequent Basin Plan amendments, including proposed water quality objectives. Our concern is that this effort could be undermined if development of water quality objectives for TOC, bromides and disinfection byproducts for the Bay Delta proceeds on a separate parallel course. In fact, due to the complexities of these issues, the CalFed Record of Decision (ROD) included both MCL goals for TOC and bromide and/or equivalent levels of public health protections (ELPH). Therefore, it would be consistent with the ROD for the Board to include ELPH methods in the development of drinking water quality objectives.

We recommend that the SWRCB, like the Regional Board, follow a technically sound, science-driven process, including involvement of all affected stakeholders. We understand that the SWRCB staff is proposing to conduct a series of future workshops to receive comments on the specific plan revisions. CVCWA plans to participate in the workshops that will address water quality objectives. At this time, we request that the SWRCB direct staff to coordinate development of water quality objectives for the Bay Delta closely with the Central Valley Regional Board's process for developing a Drinking Water Policy.

Thank you for your consideration of our concerns.

Sincerely,

Warren Tellefson
Executive Officer

WT/jp

cc: Karen Larsen, Central Valley Regional Water Quality Control Board
Jacque McCall, Chair, CVCWA Water Committee

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