



**CONTRA COSTA
WATER DISTRICT**

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February 15, 2008

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Tam Doduc, Chair
and Members of the
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Subject: Draft Strategic Plan Update: 2008-2012

Dear Chair Doduc and Members of the Board:

Contra Costa Water District (CCWD) appreciates this opportunity to comment on the Draft Strategic Plan Update: 2008-2012 (January 25, 2008 version).

CCWD has reviewed comments submitted by the California Urban Water Agencies (CUWA) and supports the issues addressed in CUWA's letter, dated February 15, 2008. We offer these additional comments for the Boards' consideration: (1) consistency between Regional Boards is key to the success of the Strategic Plan; (2) the Central Valley Drinking Water Policy is important and should inform the California Water Quality Plan; and (3) instream flow requirements should be based on the best scientific evidence and will require development of an enforcement system.

First, CCWD commends the Boards for identifying Priority 7 of the Strategic Plan, which addresses the need for consistency between Water Boards. Lack of consistency between Regional Boards in the implementation of State Board policy has been a chronic problem. Consistency must be achieved in policy, scientific methods, and enforcement arenas.

Secondly, CCWD is participating in the development of the Central Valley Drinking Water Policy with the Central Valley Regional Board and other stakeholders. This policy is vital to the protection of beneficial uses and prevention of water quality degradation. In this respect, the Drinking Water Policy should inform other planning activities, such as the California Water Quality Plan.

Finally, the approach to instream flow requirements described in Priority 1 of the Strategic Plan is ambitious. The best scientific evidence should be used to develop instream flow requirements for each individual priority stream; completion of the necessary scientific studies by December 2010 (as indicated in Action 1.4.1) seems unlikely. Additionally, implementation and enforcement of instream flow requirements will require the development of a system to enforce the requirements. Although the

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new electronic water rights information system (eWRIMS) is an important first step to allowing the public to determine what water rights are upstream of a given point of diversion, better tools need to be developed to identify relevant permits, including a method for permittees to enter near real-time diversion information.

If you have any questions regarding CCWD's comments, please call me at (925) 688-8083.

Sincerely,



Leah Orloff
Water Resources Manager

LO/DS:wec

cc: Elaine Archibald, CUWA