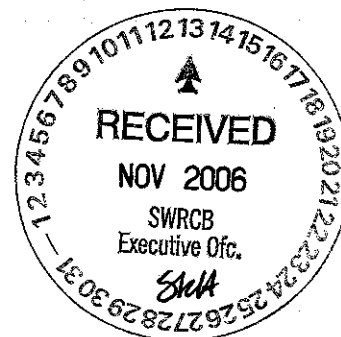




CALIFORNIA URBAN WATER AGENCIES

November 13, 2006

Song Her, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812



(Sent via email to: sher@swrcb.ca.gov)

These comments are in reply to the September 29, 2006 Draft Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary. California Urban Water Agencies (CUWA) has been engaged in the Bay-Delta Water Quality Control Plan and related activities for many years. CUWA represents major statewide drinking water utilities that support progressive water management, protection of drinking water quality, and support for credible and sound science as a basis for addressing difficult water issues. Our comments on this proposed amendment to the existing Water Quality Control Plan relate to several emerging issues noted in the draft.

We appreciate the detailed attention the draft gives to the Pelagic Organism Decline (POD), climate change and Central Valley salinity. All three are important in the context of the Bay-Delta estuary, and activities in each area could have implications in the future to provisions of the Water Quality Control Plan. It is important to stay current on the state of scientific understanding on the POD and climate change studies, particularly since both areas are subject to a great deal of scientific study and investigations. We appreciate the leadership that the State Water Resources Control Board and the Central Valley Regional Board have taken to provide greater attention to salinity in the Central Valley.

CUWA is pleased the Board has acknowledged the Central Valley Drinking Water Policy in Chapter IV, Section E.2. of the Draft Water Quality Control Plan, as an important collaborative process that will provide information on the development of potential new water quality objectives to protect the municipal and industrial beneficial use. CUWA urges the Board staff to remain engaged in the Central Valley Drinking Water Policy process, and supports the Board's plan to convene a workshop to consider new water quality objectives that may be adopted as part of the Central Valley Drinking Water Policy.

CUWA is working closely with the Central Valley Regional Water Quality Control Board, U.S. Environmental Protection Agency, California Department of Health Services, California Bay-Delta Authority and interested stakeholders on the development of the drinking water policy. Current work to support drinking water policy development includes conducting technical studies on sources of drinking water constituents of concern and evaluation of potential control strategies to protect drinking water quality. To support the development of the drinking water policy, there is a need for additional monitoring in the Delta of both the volume of agricultural discharges from Delta islands and the concentrations of drinking water constituents of concern (i.e., organic carbon, salinity, bromide and nutrients) in Delta agricultural discharges. This

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City of Sacramento
Alameda County Water District
San Diego County Water Authority
Metropolitan Water District of Southern California

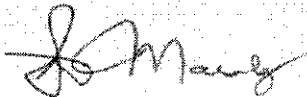
San Francisco Public Utilities Commission
City of San Diego Water Department
Santa Clara Valley Water District

Zone 7 Water Agency
Contra Costa Water District
East Bay Municipal Utility District
Los Angeles Department of Water & Power

information is needed to better understand the effects of discharge volume and quality on the municipal and industrial beneficial use. CUWA requests that the SWRCB consider including this monitoring need in Section C. Recommendations to Other Agencies, as a recommendation to the Central Valley RWQCB to include monitoring of volume and quality of Delta agricultural discharges in the implementation of the Irrigated Lands Conditional Waiver Program.

Thank you for the opportunity to provide comments. Please call me at (916) 552-2929 if there are any questions regarding our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Macaulay", written in a cursive style.

Steve Macaulay
Executive Director