



To promote the economic, social and environmental viability of Northern California by enhancing and preserving the water rights, supplies and water quality of our members.

January 10, 2005

Ms. Debbie Irvin, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812

**RE: Periodic Review of 1995 Water Quality Control Plan –
Issue 1: Proposed New Objectives**

Dear Ms. Irvin:

The Northern California Water Association does not support the staff recommendation regarding Issue 1 (Proposed New Objectives) in the Staff Report to the 1995 Water Quality Control Plan that recommends the SWRCB "...hold a workshop regarding potential new objectives for bromides or other disinfection by-products and TOC to receive new information that may have been developed since the 1991 Plan was adopted." The Staff Report notes that the SWRCB deferred consideration of new objectives during development of the 1991 plan, "...pending further scientific review of these constituents," and such a deferral is warranted at this time in light of a pending scientific review by the Central Valley Drinking Water Policy Workgroup (CVDWPWG).

While there may come a time in the future when the SWRCB should consider new water quality objectives for drinking water constituents of concern, NCWA recommends that such a workshop be scheduled to incorporate the research and conclusions of the CVDWPWG, which is currently developing and funding the technical studies needed to consider an amendment to the Basin Plan to protect the municipal beneficial use, if such protection is warranted by the underlying science. Once the scientific studies are complete, the SWRCB or Central Valley Regional Water Quality Control Board can consider adoption of objectives pursuant to California Water Code Section 13241, including evaluation of probable beneficial uses and economic considerations.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Aaron Ferguson". The signature is written in a cursive, flowing style.

Aaron Ferguson
Regulatory Affairs Specialist