



CVCWA

Central Valley Clean Water Association

Representing Over Sixty Wastewater Agencies

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September 19, 2008

Ms. Holly Grover
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite #200
Rancho Cordova, CA 95670

Subject: Public Workshop and CEQA Scoping Meeting, Development of a Drinking Water Policy for the Central Valley

Dear Ms. Grover,

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to provide written comments as part of the CEQA scoping process regarding development of a Central Valley Drinking Water Policy. These comments augment and reinforce oral testimony provided by Jacque McCall, our Water Committee chair, at your CEQA scoping meeting held on August 25, 2008 in Rancho Cordova.

CVCWA urges completion of the Work Group's January 2003 Work Plan for development of a drinking water policy for the Central Valley. In particular, CVCWA supports:

- The evaluation of impacts of Delta water quality on drinking water treatment operations as a means to assess impacts/benefits of the proposed policy, and
- The proposed use of analytical modeling tools to assess the ability to manage Delta water quality through source control actions to meet potential water quality objectives (WQOs).

CVCWA favors utilization of a contractor to perform mathematical water quality modeling within the Delta to ensure that this important task is completed in a timely manner.

CVCWA believes that the completion of the 2003 Work Plan is a prerequisite to completion of a draft Basin Plan amendment (BPA) and the fulfillment of California Water Code requirements for consideration of any proposed water quality objectives (WQOs) contained in the proposed policy. CVCWA recommends that the Regional Board adjust its BPA schedule as necessary to dovetail with completion of the technical work.

CVCWA continues to support and commend the Regional Board for the stakeholder-based process that it is using the consideration of a Drinking Water Policy for the Central Valley.

We further encourage the Regional Board to work with stakeholders to build support for a sustainable and equitable policy. We believe that we must ultimately address and implement a "partnership" concept to yield an equitable cost sharing for watershed protection activities. A purely regulatory approach that impacts Central Valley stakeholders for the benefit of out-of-Valley interests is not equitable and will not be well supported.

CVCWA offers the following specific comments on the CEQA Scoping staff report dated July 2008:

Alternative 1a: No Action: The determination of the magnitude of water quality change that will result under the No Action alternative as a result of population change in the Central Valley will be an important outcome. The Regional Board should examine historical changes in water quality to validate any future projections. If projected future water quality change is not significant, the need for significant policy changes in the Basin Plan to further protect MUN uses may not be warranted.

Alternative 1b Source Monitoring: The need for and frequency of source monitoring should be based on the need for additional monitoring data to either (a) better understand future impacts or (b) to track future changes in source loadings. Successful implementation of a regional monitoring program (RPM) in the Central Valley could assist greatly in meeting future information needs. As you are aware, CVCWA is willing to participate in the development of such a RPM.

Alternative 2: Maintain Existing Water Quality: It should be noted that this alternative would represent a shift in implementation of the antidegradation policy which allows small changes in water quality, and would be more restrictive than is currently allowed and practiced in the Central Valley. A proposal to implement this more restrictive policy must be supported by technical and legal arguments to demonstrate the necessity for this shift in comparison to the current approach, which is based, in part, on an assessment of the significance of incremental water quality changes. The actual and projected water quality changes determined under Alternative 1a must be considered in reaching a recommendation regarding Alternative 2.

The Regional Board should address the feasibility of implementing various source control actions to achieve the maintenance of water quality, including consideration for the funding requirements associated with different control measures.

Alternative 3: Improve Source Water Quality: Evaluation of this alternative requires the use of analytical modeling tools to assess the benefits of various source control strategies as described in the Work Plan. These benefits, and associated costs, should be weighed against the resulting benefits and risk reduction that would accrue to drinking water treatment agencies. The policy should not endorse significant source control expenditures or infeasible source control goals to provide marginal benefits. Also, as noted in the CEQA scoping documents, the impacts of source control on ecosystem uses must also be addressed under this alternative. The risks associated with management activities to produce water quality changes in the Delta on the fragile Delta ecosystem must be seriously evaluated.

Other Comments:

CVCWA supports moving forward first with consideration of a policy for salts and TOC, which have adequate data to perform necessary evaluations under the Work Plan.

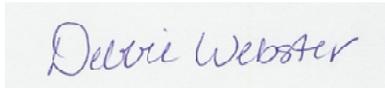
CVCWA believes that nutrients do not appear to have adequate information or tools to justify adoption of numeric WQOs. Available information indicates that taste and odor episodes, which are of concern to drinking water agencies, are not simply controlled by the adjustment of nutrient levels in Delta waters. Additionally, as stated previously, significant adjustments of nutrient levels in the Delta could potentially adversely impact the Delta food web. The cost and benefit of taste and odor controls must be balanced against the probable costs and impacts of nutrient controls in the Delta.

CVCWA believes is important that for large majority of constituents, loads rather than concentrations be considered in developing the policy and models.

CVCWA questions the need for Basin Plan changes to address specific pathogens. Available data at water intakes cited in the Sanitary Survey for the State Water Project clearly indicates that *Cryptosporidium* and *Giardia* levels at water intakes are not at levels of concern and are not causing extra water treatment expense. The benefits of additional source control measures should be clearly articulated to support the need for either numeric or narrative objectives aimed at specific pathogens.

Again, CVCWA appreciates this chance to provide public comment and will continue to be involved in the development of a Central Valley Drinking Water Policy.

Sincerely,

A handwritten signature in blue ink that reads "Debbie Webster". The signature is written in a cursive style and is contained within a light gray rectangular box.

Debbie Webster
Executive Officer, CVCWA