



CVCWA Central Valley Clean Water Association

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June 30, 2010

Ms. Holly Grover
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, California 95760-6114

Sent via email to: hgrover@waterboards.ca.gov

RE: Comments on Draft Resolution, Development of a Central Valley Drinking Water Policy for the Sacramento-San Joaquin Delta and Upstream Tributaries

Ms. Grover:

The Central Valley Clean Water Association (CVCWA) offers the following brief comments pertaining to the draft resolution.

As you know, CVCWA and its members have been active participants in the Central Valley Drinking Water Policy Work Group since 2003. That group has been working for years with Regional Board staff and other stakeholders to develop a Drinking Water Policy for the Central Valley that addresses viable concerns and conforms with the requirements of the California Water Code. We are very disappointed that CUWA failed to apply for the grant extension that would have allowed completion of the 2003 technical work plan elements over the next year that are necessary and essential to the development of a defensible policy. Those tasks that are in progress and must be completed include water quality and watershed modeling, drinking water treatment impacts analysis, and source control cost and effectiveness analysis. We believe that the resolution should clearly reflect CUWA's action and the status of remaining, essential work.

Regarding *Cryptosporidium* and *Giardia*, CVCWA continues to assert that the monitoring of sources of these pathogens should only be considered as part of a comprehensive Delta monitoring and modeling effort. Prior to such work, an important first step is to determine whether these pathogens pose a risk to water supplies at ambient levels (a task which has never been completed). Additionally, research is required to determine the fate and transport characteristics of these pathogens in surface waters.

In addition to these requested changes, CVCWA is supportive of the language changes proposed by Sacramento Regional County Sanitation District in its comments on the draft resolution.

Thank you for the opportunity to provide these comments. Please feel free to contact me at (530) 268-1338 if you wish to discuss our comments or have any questions.

Sincerely,



Debbie Webster
Executive Officer, CVCWA

c: Stan Dean - SRCSD