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February 28, 2007

Ms. Tam Doduc, Chair, and Members  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95812

Dear Chair Doduc and Members:

**COMMENTS ON CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) SCOPING FOR PROPOSED METHYLMERCURY OBJECTIVES FOR INLAND SURFACE WATERS, ENCLOSED BAYS, AND ESTUARIES IN CALIFORNIA**

The Central Contra Costa Sanitary District (CCCSD) appreciates the opportunity to comment on the State Water Resources Control Board's (SWRCB) proposed Methylmercury Objectives for Inland Surface Waters, Enclosed Bays, and Estuaries in California dated December 2006. CCCSD is a principal member of the Bay Area Clean Water Agencies (BACWA) and supports the comments submitted by BACWA in a separate letter. The primary issue concerning the District is the impacts of the development of a statewide methylmercury objective and its potential conflicts with the San Francisco Bay Area mercury total maximum daily load (TMDL).

In August 2006 the Regional Water Quality Control Board (Region 2) adopted a mercury TMDL for the San Francisco Bay. This was the culmination of an extensive effort amongst multiple organizations working together with site-specific data and using sound science. The SWRCB will consider adoption of the San Francisco Bay site-specific mercury water quality objectives later this year. Clearly, the Bay Area should be recognized for its efforts in developing the site-specific mercury TMDL and Water Quality Objectives (WQO), and should be excluded from the broader development of statewide WQO, which may potentially result in redundant or conflicting issues.

CCCSD requests that the SWRCB consider excluding the San Francisco Bay from the statewide proposed Development of Methylmercury Objectives and consider adoption of the San Francisco Bay site-specific mercury WQO and the San Francisco Bay mercury TMDL at the earliest opportunity later this year.

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CCCSD again appreciates the opportunity to comment on the proposed methyl mercury objectives. Please contact me at 925-229-7284 or Randy Schmidt at 925-229-7333 with any questions regarding these comments.

Sincerely,

Douglas J. Craig  
Plant Operations Division Manager

DJC:dk

cc: R. Schmidt