

August 2, 2000

Arthur Baggett, Chair
State Water Resources Control Board
901 P Street
Sacramento, CA 95814

Dear Chairman Baggett and Members of the Board:

On July 13, 2000, the AB 982 Public Advisory Group (PAG) began discussing the draft outline for the Staff Report on the Structure and Effectiveness of the State's Water Quality Program as it Related to Clean Water Act Section 303(d). The PAG is pleased that the State Water Resources Control Board (State Board) has begun a much needed evaluation of its Total Maximum Daily Load (TMDL) efforts.

As currently structured, the State's efforts to develop TMDLs have not been effective. As the PAG and the State Board consider how to improve the State's performance, the PAG recommends that the State Board acknowledge in the Report that California's approach has been inadequate to meet the challenge of developing TMDLs.

After reviewing the Report outline, the PAG is concerned that, absent such a candid assessment, the State's efforts to develop TMDLs will continue to be insufficient notwithstanding our efforts and recommendations. Without such an acknowledgment, the Legislature and Governor may be left with the mistaken impression that the TMDL program is moving forward at a reasonable pace. In fact, the PAG has repeatedly noted that the State's TMDL program is significantly underfunded. Accordingly, we hope that the State Board will direct its staff to frankly assess the results of the State's TMDL program to date and then make recommendations sufficient to assure that water quality standards are achieved throughout the State.

Sincerely,

David Beckman
Co-Chair

Craig Johns
Co-Chair