DEPARTMENT OF WATER RESOURCES

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April 25, 2012

Charlie Hoppin, Chair
Francis Spivey-Weber, Vice Chair
Tam M. Doduc, Member
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814



RE: California Department of Water Resources Comments on the State Water Resources Control Board Notice of Scoping Meeting for Environmental Documentation for the Update and Implementation of the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary: Comprehensive Review

Dear Chairman Hoppin and Members of the Board:

The California Department of Water Resources (DWR) appreciates the opportunity to comment on the State Water Resources Control Board's (the Board) Notice of Scoping Meeting for Environmental Documentation for the Update and Implementation of the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary: Comprehensive Review (Bay-Delta Plan Comprehensive Update). DWR intends to fully participate, and its staff will provide detailed comments and present information.

DWR encourages the Board to recognize during this scoping, as the Board has in the past, information presented in the Bay-Delta Conservation Plan (BDCP) so that it may be incorporated into the Bay-Delta Plan Comprehensive Update. BDCP is a collaborative effort involving multiple state and federal agencies and stakeholder organizations and is consistent with the co-equal goals of "providing a more reliable water supply for California and protecting, restoring and enhancing the Delta ecosystem." (Water Code Section 85054.) In addition, the science presented in the BDCP addresses the ecological changes that have occurred within the Delta over the last 25 years, including changes in the food web, invasive species, and water quality. As such, the BDCP represents a source of current scientific and operational information that should, to the maximum extent possible, be included in the Bay-Delta Plan Comprehensive Update.

Furthermore, the Bay-Delta Plan Comprehensive Update's analysis timeframe should be coordinated with that of the BDCP. This coordination will ensure that both the Bay-Delta Plan and the BDCP look sufficiently into the future when considering operations that are likely to occur based on planning taking place today. In particular, when considering the future conditions within the Sacramento-San Joaquin Delta Estuary, the Board should consider the effects related to climate change on Delta water quality, water supply and the timing of water availability.

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DWR also refers the Board to its previous comments, such as those made for the 2010 flow criteria, which remain relevant. Many of the statements made previously continue to be concerns for DWR and may be restated in later comments.

Thank you for consideration of these comments. If you have questions, feel free to contact me.

Sincerely,

Dale K. Hoffman-Fløerke

Deputy Director, Delta and Statewide Water Management