



January 6, 2005

Ms. Debbie Irvin, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812

RE: Periodic Review of M&I Chloride Objectives

Dear Ms. Irvin:

The California Urban Water Agencies (CUWA) appreciates this opportunity to provide input to the State Water Resources Control Board (SWRCB) as part of the Periodic Review of the 1995 Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (1995 Plan). CUWA is an urban water user organization consisting of eleven municipal water providers¹ serving over 20 million consumers in Sacramento, the San Francisco Bay Area, and southern California. CUWA's mission is to provide a forum for combining the expertise and resources of its member agencies to study and promote the need for a reliable, high quality water supply for the state's current and future urban water needs.

We offer the following comments for the SWRCB's consideration as part of the Periodic Review workshop. Our comments address elements of Issue 4, "chloride objectives, compliance location at Contra Costa Canal at Pumping Plant #1, and potential new objectives".

150 mg/L Chloride Objective (Issue 4a)

One of the municipal and industrial (M&I) water quality objectives in the 1995 Plan requires a chloride concentration of 150 mg/L chloride or better be maintained for a given number of days, based on water year type, at either the Antioch Pumping Plant or Contra Costa Water District's Pumping Plant #1. As the SWRCB acknowledged in the 1995 Plan, the 150 mg/L objective provides some protection of drinking water quality in the Delta. That objective currently provides some protection of source water quality for the 23 million Californians that rely on the Delta for their drinking water supply. CUWA strongly requests that the SWRCB not eliminate this objective as part of the current Periodic Review, or otherwise modify the objective in a way that would degrade the Delta as a source of drinking water.

¹ Members include Alameda County Water District, Contra Costa Water District, East Bay Municipal Utility District, Los Angeles Department of Water and Power, Metropolitan Water District of Southern California, City of Sacramento Utilities Department, San Francisco Public Utilities Commission, San Diego County Water Authority, City of San Diego Water Department, Santa Clara Valley Water District, and Alameda County Flood Control and Water Conservation District, Zone 7.

Potential New Drinking Water Objectives (Issue 4c)

Central Valley Drinking Water Policy. CUWA is working closely with the Central Valley Regional Water Quality Control Board (RWQCB), U.S. Environmental Protection Agency, the Department of Health Services, California Bay-Delta Authority, and interested stakeholders to develop a Drinking Water Policy for surface waters in the Central Valley. The objective of the drinking water policy is to provide clear guidance and regulatory mechanisms to ensure protection of drinking water source water quality in the Central Valley, including the Delta. Development of this policy includes conducting technical studies on sources of drinking water constituents of concern and evaluation of potential control strategies to identify those that are reasonably attainable and cost-effective. SWRCB staff participates in the workgroup supporting the technical studies. The drinking water policy studies will provide information on appropriate water quality goals and implementation strategies for drinking water constituents of concern, including DBP precursors. It is anticipated that the drinking water policy studies and Basin Plan amendment will be completed by 2009.

Since the planned Central Valley drinking water policy will form a key building block upon which drinking water goals and programs would be based, it would be premature for the SWRCB to consider eliminating the 150 mg/L chloride objective until these studies are complete, and actions have been identified to improve Delta water quality. We ask that the SWRCB recognize the importance of this effort and its relevance to periodic review of the 1995 Plan.

Disinfection By-products. The September 30, 2004 SWRCB Staff Report regarding the Periodic Review discusses the matter of disinfection by-products (DBPs) as a potential consideration for new Plan objectives. The SWRCB's 1991 Water Quality Control Plan stated (page 5-5):

“Due to the concerns with DBPs in treated water from the Delta and in keeping with the goal (not objective) of obtaining the best available drinking water, the Board finds that, wherever feasible, municipal water supply agencies should strive to obtain bromide levels of 0.15 mg/l or less (about 50 mg/L chloride in the Delta).”

The SWRCB in 1991 was focused primarily on trihalomethanes but acknowledged that other DBPs are likely to become an issue in the future. In fact, the U.S. Environmental Protection Agency (EPA) has promulgated more stringent regulations for trihalomethanes since 1991 and has promulgated regulations for additional DBPs.

In 1998, CUWA convened a drinking water expert panel to determine what level of Delta source water quality would be needed to meet potential future EPA drinking water regulations for DBPs and microbial contaminants using conventional drinking water treatment facilities (*Bay-Delta Water Quality Evaluation - Draft Final Report*. Malcolm Pirnie, Inc., Camp, Dresser and McKee, University of Cincinnati. June 1998.) A bromide expert panel convened by the CALFED Bay-Delta Program in November 1998 subsequently supported the CUWA panel findings. These findings were incorporated into the CALFED Record of Decision (August, 2000) as a target for providing safe, reliable, and affordable drinking water in a cost-effective way. Specifically the target is to achieve either: (a) average concentrations at Clifton Court Forebay and other southern and central Delta drinking water intakes of 50 µg/L bromide and 3.0 mg/L total organic carbon, or (b) an equivalent level of public health protection using a cost-effective combination of alternative source waters, source control and treatment technologies. The CALFED Drinking Water Quality Program is

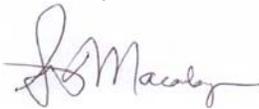
developing a strategic plan to identify the actions that will be needed to achieve the equivalent level of public health protection (ELPH) goal.

CUWA strongly supports the CALFED Drinking Water Quality Program. This program has established a goal of continuous improvement in water quality and a specific target for providing safe, reliable, and affordable drinking water in a cost-effective way. The CALFED Record of Decision included many actions that, if implemented, would help to meet these goals. More recently, the CALFED Bay-Delta Public Advisory Committee Drinking Water Subcommittee has developed a list of actions that could also be implemented to meet these goals. One example action is modification of Franks Tract in the Central Delta. By repairing the levees around the flooded island, particularly in the west, tidal mixing would be reduced, reducing the trapping of saltier water within the interior Delta. This Franks Tract project and other CALFED water quality actions are expected to improve Delta water quality.

More information will become available in the next few years as a result of the CALFED Drinking Water Quality Program research and implementation of water quality actions, and through completion of the Central Valley Drinking Water Policy. It is possible that CALFED may need to identify additional actions that will be needed in the future to protect the investments made to improve Delta water quality. We recommend that the SWRCB specifically acknowledge the importance of protecting source water for drinking water use and protection of public health as part of the new Plan.

If you have any questions, please contact me at (916) 552-2929.

Sincerely,



Steve Macaulay
Executive Director

cc: CUWA Board of Representatives
Walter Bishop, General Manager, Contra Costa Water District
Dennis Diemer, General Manager, East Bay Municipal Utilities District
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