

United States Department of the Interior

Comments on Process for Periodic Review of
1995 Bay-Delta Water Quality Control Plan
September 14, 2004

The United States Bureau of Reclamation and United States Fish and Wildlife Service support the State Water Resources Control Board in beginning a review of the 1995 Bay-Delta Water Quality Control Plan (Delta WQCP). The two agencies have begun coordinating their preparation of information to submit as part of the Board's review. We look forward to working with all stakeholders as the review proceeds.

Issues. We agree that the issues identified in the August 30, 2004, Draft Resolution are the ones that most urgently need the Board's review. We, however, believe that a different order of those issues may promote a more effective and productive review. We suggest that the Board consider the issues as follows:

1. Water quality compliance and baseline monitoring program
2. Chloride objectives, compliance location at Contra Costa Canal at Pumping Plant #1, and potential new objectives
3. Export limit objectives
4. Delta Cross Channel gates closure objective
5. Salmon protection objective
6. Delta Outflow objectives
7. River flow objectives: Sacramento River at Rio Vista
8. River flow objectives: San Joaquin River at Airport Way Bridge, Vernalis, February-April 14 and May 16-June
9. San Joaquin River at Airport Way Bridge, Vernalis: 31-day Pulse Flow objectives for April 15-May 15
10. Southern Delta Electrical Conductivity objectives
11. Other parts of the Program of Implementation

Dates. We recommend that the workshop begin on October 27, 2004, rather than October 12, 2004. The additional time will allow our two agencies to make substantial progress on coordinating our response. Such analysis and coordination will improve the quality of the presentation that we will be able to present to the Board, thereby reducing any disputes that the Board may find necessary to resolve. As for the November dates, it is important to note that the Environmental Water Account Science Conference will occur on November 8-10, which will engage both agency and stakeholder scientists who would otherwise be available for the review workshops on those dates.

Process. The Department of the Interior recommends that the review process be modified in a manner to provide greater opportunity for full development of information and coordination of comments. Although we agree with the goal of completing the review in a timely manner, Reclamation and the Service may need additional time to address some parts of the Delta WQCP, particularly after hearing the information presented at the workshops. We therefore propose that the Board set staggered deadlines for submitting written material on each issue, conduct the workshops, and then allow the parties to submit additional information and comments until all workshops have been completed. We understand that granting such flexibility may add some confusion to the workshop process; however, we believe that it will lead to full disclosure of pertinent information for the consideration of the Board.