



February 15, 2008

Tam Doduc, Chair
and Members of the
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Strategic Plan Update 2008-2012

Dear Chair Doduc and Members of the Board:

California Urban Water Agencies (CUWA) commends the State Water Resources Control Board and the Regional Water Quality Control Boards (Water Boards) for developing the draft Strategic Plan Update 2008-2012 (Strategic Plan) in a collaborative process with affected stakeholders. CUWA participated in the Stakeholder Summit in March 2007 and in the Central Valley stakeholders meeting and we offer the following comments.

Overarching Framework

We are pleased that the Water Boards recognize the value of a watershed approach to protecting water quality. CUWA has long supported the watershed approach because we feel that it is the most cost effective and technically valid method of achieving overall improvements in water quality. The draft Strategic Plan focuses on constituents that are on the 303(d) list and impaired water bodies. While this is certainly needed, CUWA recommends that the Strategic Plan recognize that the Water Boards have the responsibility for protecting all beneficial uses and for maintaining the high quality of water bodies that are not currently impaired.

Climate change and population growth will affect water quality in the future, as pointed out in the Strategic Plan. Population growth will place greater demands on surface water supplies and will lead to increased wastewater and urban runoff discharges that will increase the loads and concentrations of organic carbon, nutrients, salt, and pathogens in drinking water sources. CUWA's members have invested billions of dollars to install advanced water treatment processes; however, controlling these constituents at the source is needed to insure that public health is adequately protected. Organic carbon, nutrients, and actual pathogens such as *Giardia* and *Cryptosporidium* are not currently regulated by the Water Boards. CUWA is working with the Central Valley Regional Water Board and affected stakeholders to develop a drinking water policy that will address these constituents.

Priority 1. Protect and Restore Surface Waters

CUWA recommends that the goal statement be rephrased to focus on water quality protection and improvement rather than on implementation of total maximum daily loads (TMDLs).

CUWA supports the concept of addressing all water quality impairments in a watershed in a single program. We believe that a master TMDL approach could result in ancillary water quality improvements due to implementation of management practices designed to address a number of constituents. As watersheds are identified for master TMDLs, the Water Boards should meet with affected stakeholders to determine if there are alternatives to TMDL development that would be more effective and would result in greater improvements in water quality. The Strategic Plan should allow for alternative approaches based on stakeholder collaboration.

The Strategic Plan states that priority watersheds will be addressed through the master TMDL approach; however the plan does not define priority watersheds or describe the process for identifying priority watersheds.

Objective 1.3. Manage urban runoff volume and reduce pollutant loadings by 10 percent by 2012, and explore opportunities to augment localized water supply where applicable.

CUWA supports efforts to reduce constituent loadings from urban runoff but it is not clear how the Water Boards arrived at the 10 percent reduction by 2012, which water quality constituents are included, or how this objective will be achieved by the actions listed in the Strategic Plan, particularly in rapidly growing areas such as the Central Valley.

Priority 2. Protect Groundwater

CUWA recommends that the goal statement be rephrased to focus on groundwater quality protection and improvement rather than on reducing waste discharges.

Objective 2.1. Implement an integrated groundwater protection approach by 2012 to protect groundwater in high use basins...

CUWA supports an integrated groundwater protection approach. We believe an integrated approach includes regulation of waste discharges along with other activities such as remediation of contaminated sites, groundwater recharge programs, and controls on constituent loadings. The Strategic Plan should recognize that there are a number of tools for improving groundwater quality.

The Strategic Plan should include a definition of high use basins and a list of the high use basins, if they have already been identified.

Priority 3. Promote Sustainable Water Supplies

CUWA's members have invested heavily to diversify their water supply portfolios. Conservation and recycling are two of many options for developing sustainable water supplies. The Strategic Plan should recognize that there are other options and that the importance of conservation and recycling varies from region to region. While funding and public acceptance are key obstacles to the use of recycled water, regulatory constraints that lead to protracted permitting processes make it difficult to achieve recycled water goals. Rather than applying

regulatory pressure through wastewater and water rights permits, the State Water Board could encourage recycling by streamlining the permitting process, particularly for recycled water irrigation projects that are shown to be protective of groundwater and surface water quality. The Strategic Plan should include a description of how the Water Boards arrived at the goal to increase sustainable water supplies by 1,725,000 acre-feet per year by 2015.

Priority 4. California Water Quality Plan

Development of the California Water Quality Plan and integration of this plan with the Water Plan is critical. The Strategic Plan calls for developing the processes to achieve this coordination by December 2009. These activities should be accelerated to ensure that water quality is a key component of the California Water Plan Update 2009.

Priority 5. Basin Planning

At the Stakeholder Summit there was broad support for updating the Basin Plans. While there is certainly a need to work with stakeholders to develop a consistent format and user's guide, an action should be added to identify the key concerns with the existing Basin Plans. The stakeholders group should work with the Water Boards to identify options to address the concerns and develop a priority list of concerns to address in the next five years. CUWA would be pleased to represent urban drinking water agencies on the stakeholders group.

Priority 6. Transparency and Accountability

CUWA supports the Water Boards efforts to make water quality data more accessible. Rather than developing subjective report cards (Action 6.4) as a method of communicating with the public, CUWA recommends that the Water Boards work with the stakeholders to develop an effective tool for communicating water quality information and progress towards meeting the goals outlined in the Strategic Plan.

CUWA commends your efforts to develop the Strategic Plan and we look forward to working with you and other stakeholders to implement the plan. Please call me if you have any questions on our comments.

Sincerely,



Elaine M. Archibald
Executive Director