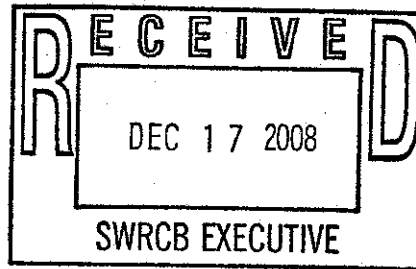


5750 ALMADEN EXPWY
SAN JOSE, CA 95118-3686
TELEPHONE (408) 265-2600
FACSIMILE (408) 266-0271
www.valleywater.org
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December 16, 2008



Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comment Letter – Anti-degradation Policy (Resolution 68-16)

The Santa Clara Valley Water District (District) serves nearly 1.8 million residents of Santa Clara County. Ensuring a safe, reliable supply of high-quality water now and in the future is a top priority for the District. The District is the groundwater management agency for Santa Clara County and also provides flood protection, stream stewardship, and water supply.

In accordance with the Clean Water Act, the Porter-Cologne Act, and the State's Anti-degradation Policy, the fundamental principle of California's approach to water management is balancing competing objectives to maximize the beneficial uses of resources for present and future generations. The expansion of sources such as recycled water, desalination, and stormwater must be carefully balanced with the protection of existing high-quality resources. In Santa Clara County, as in most of the State, future demands will primarily be met with existing sources. Erosion of water quality of existing sources will increase the demand for supplemental supplies; therefore, maintaining the quality of our existing sources is critical.

The District strongly supports the State's Anti-degradation Policy which is essential to surface water and groundwater protection. Our county relies on high-quality groundwater for nearly half of all municipal, industrial, and agricultural uses. Communities in the southern portion of the county rely on groundwater as the sole drinking water source. To protect existing high-quality sources and maximize beneficial uses, any potential degradation of water resources should continue to be considered in the context of the Anti-degradation Policy, which requires a demonstration that any change in water quality is necessary for important economic or social development.

The District supports the flexibility of existing State Policy in allowing water resources protection and the beneficial uses of water. We are concerned that the balancing approach of the Anti-degradation Policy may be compromised by developing uniform implementation guidelines at the state-wide level, which may result in a "one size fits all" approach. Achieving the balance between water resource protection and beneficial use is best done in coordination with all potentially affected entities, based on case specific conditions and flexible criteria that consider the benefits and tradeoffs of projects and variations in water need, hydrology, water quality, and hydrogeology.

If you have any questions, please contact Behzad Ahmadi at (408) 265-2607, extension 2324.

Sincerely,



Keith Whitman
Deputy Operating Officer
Water Supply Operations & Maintenance Division

cc: B. Ahmadi, V. De La Piedra, G. Zlotnick, F. Brewster, J. Maclay, E. Cote, J. Fiedler, O. Martin Steele

kw: vjd

