

SDWA-EXH-15 GK

SOUTH DELTA WATER AGENCY

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STATE WATER RESOURCES
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March 1, 2006

Via Fax 916 341-5400

State Water Resources Control Board
Ms. Gita Kapahi, Chief
Bay/Delta Special Projects Unit
P. O. Box 2000
Sacramento, CA 95812-0100

Re: Periodic Review of the Bay-Delta 1995 Water Quality Control Plan

Dear Ms. Kapahi:

In addition to the prior comments and presentations made by SDWA in the above matter, I would like to also submit and reference other recent materials for consideration by staff and the Board. Those materials include the testimony, rebuttal testimony, and transcripts associated with the recent Cease and Desist Order proceeding regarding DWR and USBR's threatened violation of interior Delta standards. In addition, I believe the Peer Review of the CALSIM II modeling is also relevant information and should be considered in the periodic review process.

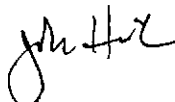
Those materials are being transmitted with the hard copy of this letter and will be included in one or more CD's.

As we have previously stated, we believe the above-referenced materials make it clear that the positions and proposals by other parties regarding relaxation or removal of South Delta water quality standards are based on facts and circumstances not applicable to the Delta or are based on simple misunderstandings relating to the flushing of salts from soils. I believe a review of the CDO transcripts clearly shows that South Delta rebutted the evidence arguing against maintaining the current standards, and such rebuttal was in no meaningful way challenged.

Ms. Gita Kapahi, Chief
Bay/Delta Special Projects Unit
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Finally, again as we have previously stated, SDWA believes it would be not only against public policy but ill-advised for the Board to consider relaxing the South Delta standards now that they have finally become effective.

Very truly yours,



JOHN HERRICK

JH/dd

Enclosure

cc: Dante J. Nomellini, Esq.