



California Regional Water Quality Control Board

San Francisco Bay Region



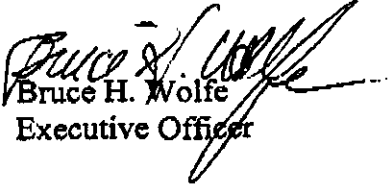
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Arnold Schwarzenegger
Governor

TO: Craig J. Wilson
Division of Water Quality
State Water Resources Control Board

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FROM: 
Bruce H. Wolfe
Executive Officer

DATE: February 18, 2004

SUBJECT: TMDL Roundtable Comments on Draft Water Quality Control Policy for
Developing California's Clean Water Act Section 303(d) List - December 2003

Thank you for the opportunity to provide comments on the proposed Policy. First and foremost, I fully support and endorse the comments submitted by the TMDL Roundtable. The TMDL Roundtable's comments reflect an understanding of the benefits and challenges of a policy that provides for more consistency amongst the Regions while also recognizing that there are distinct differences in water bodies and water quality standards. They also reflect the need for consistency with our other water quality programs particularly in terms of staff and monitoring resource limitations. I also offer the following Region 2 specific comments that reflect inconsistencies between the proposed Policy and the Regional Monitoring Program for San Francisco Bay.

The Regional Monitoring Program for San Francisco Bay (RMP) is arguably the most comprehensive monitoring program in the State designed to monitor attainment of water quality standards. However, even with an annual budget of \$3 million, the RMP does not generate sufficient data to effectively apply the binomial approach as proposed in the Policy. Of particular concern are the constraints posed by the proposed Policy on aggregation of data (Section 6.2.5.6). The RMP collects water column data once a year from a total of 22 stations throughout all San Francisco Bay segments (eight water bodies), but the monitoring station locations are based on hydrology considerations, not the Basin Plan segmentation required by the proposed Policy to aggregate data. There are no stations in one segment, Carquinez Strait, due to its hydrological connection to San Pablo Bay and Suisun Bay. A consequence of the proposed Policy is that Carquinez Strait could not be placed on the 303(d) list even when data from stations on both sides of the Strait indicate water quality standards are not attained within the Strait. Clearly, this would be an unintended negative consequence of the proposed Policy.

I appreciate your attention to our comments; my staff would be willing to work with you to make the changes necessary to address our concerns and the concerns of the other regions. If you have any questions, please call me at 510 622-2314 or Tom Mumley at 510 622-2395.