



United States Department of the Interior
Periodic Review Workshop
2006 Water Quality Control Plan for the Bay-Delta
October 1, 2008

The United States Bureau of Reclamation (Reclamation) and the United States Fish and Wildlife Service (Service) provide the following comments in response to the State Water Resources Control Board (Board) Notice of Public Workshop for the Periodic Review of the 2006 Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (2006 Bay-Delta Plan). The Notice requests a description of plan elements that should be amended or added and a brief statement of reasons for the recommended changes or additions. Following the October 8, 2008 workshop regarding which plan elements should be amended, the Board will commence the second phase of the Periodic Review in which it considers specific amendments.

Reclamation and the Service recommend that the Board review the following 2006 Bay-Delta Plan elements:

1. Water quality compliance and baseline monitoring program
2. Chloride objectives, compliance location at Contra Costa 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. River flow objectives: San Joaquin River at Airport Way Bridge, Vernalis, 31-day Pulse Flow objectives for April 15 – May 15
10. Southern Delta Electrical Conductivity (EC) objectives
11. Relevant parts of the Programs of Implementation for each of the above.

The rationale for requesting a review of the above objectives and programs is that in December 2008 the Service will be issuing its Biological Opinion regarding the effects of the continued long term operations of the Central Valley Project (CVP) and State Water Project (SWP) (Service BiOp). In addition, the National Marine Fisheries Service (NMFS) will complete its biological opinion regarding effects of continued long term operations of the CVP and SWP on listed salmonids and Green Sturgeon (NMFS BiOp) in March 2009. Reclamation and the Service expect that after the Service BiOp and the NMFS BiOp are completed next year, it would be appropriate to review the water quality objectives for fish and wildlife beneficial uses and determine whether amendments are needed. However, Interior recommends that the Board not commence the second phase of the Periodic Review until after the Service's BiOp and NMFS BiOp are completed next year.

With respect to water quality objectives for municipal and industrial beneficial uses, and water quality objectives for agricultural beneficial uses, Reclamation continues its same concerns from the 2004 Periodic Review regarding the reasonableness of the objectives, potential conflicts, and the programs of implementation. We believe that all of the above plan elements should be reviewed by the Board due to the current state of the Delta fisheries, and/or water supply issues and potential beneficial use conflicts which have been previously communicated to the Board.