STATE OF CALIFORNIA
GEORGE DEUKMEJIAN, Governor
STATE WATER RESOURCES CONTROL BOARD
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6-25-86

~~RA/DRA~~
Referred To W-1
cc: ORA
File:

JUN 23 1986

Judith E. Ayres
Regional Administrator
U.S. Environmental Protection Agency
Region 9
215 Fremont Street
San Francisco, CA 94105

Dear Ms. Ayres:

SECOND TRIENNIAL REVIEW OF THE 1978 WATER QUALITY CONTROL PLAN FOR THE SACRAMENTO-SAN JOAQUIN DELTA AND SUISUN MARSH (DELTA PLAN)

In a letter dated September 16, 1985, Mr. David Jones of your staff indicated that there were a number of issues regarding the State Delta Plan submittal which needed to be discussed before EPA could take action on the SWRCB's reconfirmation of the water quality standards in this plan.

Subsequent to that time your staff has asked the Board for additional information on the striped bass survival and spawning standards. In particular, they have requested information to support the Board's findings that the water quality criteria protect the fish and wildlife beneficial uses; are based on sound scientific rationale; and contain sufficient parameters, such as toxics, to protect the designated beneficial uses. In addition, they have asked for clarification on the wording of the Board's triennial review approval resolution. EPA has questioned the consistency of this resolution with the findings in the prehearing staff report.

During the same time frame as these discussions, the Board has appointed an ad hoc toxic committee to review existing literature and studies dealing with toxic pollutants in the San Francisco Bay-Delta estuary. The main objective of this review is to differentiate flow and salinity impacts on the fishery from pollutant related impacts. Information from this study and others will be brought to the Board in the upcoming Bay-Delta hearings. In addition, the Board has scheduled five prehearing conferences in order to provide the public with the opportunity to assist the Board in refining the issues that need to be resolved in order to protect the beneficial uses of the estuary.

*1 The decline in the Striped Bass Index clearly indicates that current standards are not adequate to protect the fishery resource. However, the Delta Plan was narrowly focused to deal only with flow and salinity impacts. Some scientists believe that pollutants (perhaps from nonpoint sources) may be playing a significant role in the decline of striped bass. Therefore, it has become increasingly evident that further coordination between the State Board's efforts to deal with water quantity issues in the estuary must be closely coordinated with the Basin Plan updates of the Regional Boards. We have already met with the Regional Boards and will continue to do so until a mutually agreeable process is developed to involve them during that part of the hearing process when evidence on pollutant impacts will be heard.

The prehearing conferences to help the Board establish the scope and issues for the Bay-Delta hearing have begun and will be concluded in June. The Board proposes adopting a workplan setting the scope, process and schedule for this hearing. This workplan should be adopted by October 1986. Any necessary modifications to the State Board triennial review resolution will be made at that time. A coordinated effort by the State and Regional Board should assure that water quality standards will be established to fully protect the designated beneficial uses of the Bay-Delta estuary. *1

We have kept EPA fully informed of each phase of the planning of the hearings and we will continue to keep EPA fully informed of our actions as they relate to standards concerning the Bay-Delta estuary.

Sincerely,

Raymond Walsh

Raymond Walsh
Interim Executive Director

cc: San Francisco Regional Water Quality Control Board

Central Valley Regional Water Quality Control Board