

Suggested Changes to BDPAC-DWS
Recommendations for a CALFED Drinking Water Quality Strategy 2002
Submitted by Jim Sequeira

All my suggested changes involve Page 8 of the draft and are as follows:

POTW/muni/indust refer to “point sources,” which include publicly owned treatment works (POTWs), industrial dischargers, and municipal storm water systems operating under discharge permits issued by the Central Valley Regional Water Quality Control Board (CVRWQCB). Discharge permits must ~~have~~ include limits for those constituents ~~with~~ for which there is reasonable potential to cause or contribute to a violation of an applicable “water quality standards” ~~which have a reasonable potential to impair a listed beneficial use. At this point in time, there is no standard policy on drinking water quality adopted by the CVRWQCB and therefore adopting a policy is a specific tool of the strategy.~~

Non-point/agric refer to “non-point sources” of pollution which include agriculture, forestry, urban runoff, mining, and construction. Non-point sources are generally ~~regulated~~ addressed by the CVRWQCB through general discharge waivers or through Total Maximum Daily Loads for specific chemical constituents on specific stretches of river. The CVRWQCB is currently going through a process to analyze its general discharge waiver for agricultural runoff and its impact on the environment. Non-point source pollution is historically managed using incentive based, non-regulatory programs, such as best management practices.

Watershed work refers to the restoration of watershed functions, such as base flow capacity, natural filtration and sediment trapping capabilities.

The SWRCB has established policy with regard to drinking water quality (Sources of Drinking Water Policy, Resolution 88-63). This policy is incorporated by the CVRWQCB into the Basin Plan for the Sacramento-San Joaquin River watersheds. Reviewing and, if appropriate, amending this policy, is one specific tool of the drinking water quality improvement strategy.

Rationale:

It is incorrect to say that there is no policy on drinking water policy adopted by the Regional Board. I have modified this reference. Also because a “water quality policy” applies to all dischargers, point and non-point, I moved reference to it to the end.

Changed “regulated” to “addressed” in second paragraph as one who has a waiver is not being regulated.