

LATE COMMENT

Department of Water and Power



the City of Los Angeles

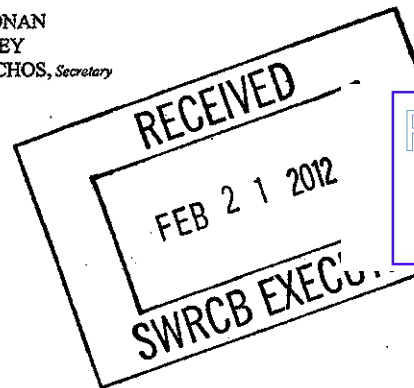
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February 17, 2012

Mr. Charles M. Hoppin, Chair
Ms. Frances Spivy-Weber, Vice Chair
Ms. Tam M. Doduc, Member
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814



Dear Board Members:

Subject: Schedule of Actions to Update the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary

On behalf of the Los Angeles Department of Water and Power (LADWP), thank you for this opportunity to share our concerns regarding the proposed Schedule of Actions to Update the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta).

The LADWP is the largest municipal utility in the nation and is committed to delivering safe and reliable water to over 600,000 customers. On average, LADWP purchases over 50 percent of its water supply from the Metropolitan Water District of Southern California, which is a State Water Project (SWP) contractor. As such, the City of Los Angeles has a vested interest in the timely achievement of the co-equal goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the ecosystem of the Sacramento-San Joaquin Delta Estuary (Delta).

The LADWP also owns and operates the Castaic Pumped Storage Power Plant located near Castaic, California, on the West Branch of the SWP. The Castaic Power Plant is LADWP's largest source of hydroelectric capacity and consists of seven units with a net dependable capacity of 1,175 megawatts. Castaic Power Plant provides peaking and reserve capacity for LADWP's load requirements.

LADWP shares the concerns outlined in a recent letter to the State Board from several water and power agencies and associations (including the California Municipal Utilities Association and the State Water Contractors, among others) on the current schedule to act on critical portions of the Bay-Delta Water Quality Control Plan before the Bay Delta Conservation Plan (BDCP) is completed. We agree with the statement in the letter that initiating these revisions before the BDCP process is completed would not be appropriate or consistent with the Delta Reform Act of 2009.

Water and Power Conservation ... a way of life

111 North Hope Street, Los Angeles, California 90012-2607 Mailing address: Box 51111, Los Angeles 90051-5700
Telephone: (213) 367-4211 Cable address: DEWAPOLA

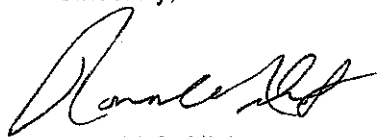
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LADWP supports the BDCP as the appropriate mechanism for the identification and approval of Delta ecosystem restoration actions and conveyance improvements needed to achieve the co-equal goals for the Delta, as established by the 2009 Delta Reform Act. The BDCP takes a holistic approach to promoting Delta ecosystem health, accounting for benefits of proposed habitat restoration and measures to address stressors such as non-native species. For the State Board to proceed with setting new flow objectives for the Delta without the guidance provided by a completed BDCP could result in unnecessary, significant negative impacts to water and power providers, like the LADWP, across the state.

Therefore, LADWP requests that the State Board revise the proposed schedule to update the Bay-Delta Water Quality Control Plan to clearly coordinate its process with ongoing parallel efforts to improve Delta conditions through the BDCP and Endangered Species Act, and to account for the significant amount of new science that has been under development since the Water Quality Control Plan was last amended. By doing so, the State Board can ensure that its obligations are met in a manner which accounts for all beneficial uses and that it meets the legislatively established co-equal goals.

If you have any questions, please contact me at (213) 367-1338 or Mr. David R. Pettijohn, Manager of Water Resources, at (213) 367-0899.

Sincerely,



Ronald O. Nichols
General Manager

DRP:kao/km

c: Mr. David R. Pettijohn