

Department of Water and Power



the City of Los Angeles

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April 23, 2012

Mr. Charles Hoppin, Chair
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Ms. Tam Doduc, Member
(c/o Jeanine Townsend, Clerk to the Board)
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100



Dear Chairman Hoppin and Members of the Board:

Subject: Supplemental Notice of Preparation for the Update to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary: Comprehensive Review

The Los Angeles Department of Water and Power (LADWP) appreciates this opportunity to provide comments regarding the scope and content of the information to be included in the State Water Resources Control Board's (State Board) Supplemental Environmental Document (SED) for the review and potential modification of the 2006 Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (2006 Bay-Delta Plan).

The State Board's Supplemental Notice of Preparation and Notice of Scoping Meeting for Environmental Documentation for the Update and Implementation of the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary: Comprehensive Review dated January 24, 2012, does not fully define the project and reflects the fact that the State Board has not yet identified how it may change the 2006 Bay-Delta Plan. Our understanding is that once the project has been fully defined, LADWP and the public will be able to provide comments on identifying the significant environmental issues, reasonable alternatives, and mitigation measures that should be addressed in the SED.

Under the California Environmental Quality Act (CEQA), the State Board must consider the potentially significant environmental effects of the project and a reasonable range of alternatives. The LADWP would be particularly concerned about potential impacts to public trust resources under a scenario based on the 2010 Flow Criteria for the Sacramento-San Joaquin Delta Ecosystem, prepared pursuant to the Sacramento-

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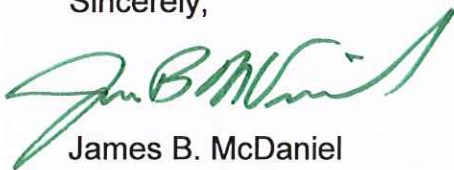
San Joaquin Delta Reform Act of 2009. Such a scenario would depend on an outflow standard based on a percent of the unimpaired flow hydrograph, with likely significant impacts on the environment, including the following:

- Loss of fresh drinking water supplies with freshwater exports from the Sacramento-San Joaquin Delta cut in half, costing California a water supply roughly equivalent to that used by the greater San Francisco Bay urban area;
- Decreased ability for water agencies across the State to prepare for water shortages due to reduced storage levels in reservoirs;
- Inability to meet existing water quality requirements for freshwater flows and salinity in the Delta due to the lack of available reservoir storage; and
- Loss of clean, renewable hydropower at a time when the State is seeking to reduce carbon emissions.

Because these types of potentially significant environmental effects may result from changes to the 2006 Bay-Delta Plan, the LADWP urges the State Board to rigorously review the science and use the best and most current scientific and technical information available. In light of the weight of the new science that the State Board must consider, LADWP anticipates that the State Board will need a public process whereby they can receive important new information from the scientific community. LADWP looks forward to engaging in such a process.

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

Sincerely,



James B. McDaniel
Senior Assistant General Manager – Water System

DRP:kao/ar

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