



**CONTRA COSTA  
WATER DISTRICT**

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November 6, 2006

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State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812



**Subject: Comments on the Amended Water Quality Control Plan for the  
San Francisco Bay/Sacramento-San Joaquin Delta Estuary**

Dear Ms. Her:

The Contra Costa Water District (CCWD) appreciates the opportunity to provide comments to the State Water Resources Control Board (State Water Board) regarding the amended Water Quality Control Plan (the Plan) for the San Francisco Bay / Sacramento-San Joaquin Delta Estuary (September 2006). CCWD played an active role in the development, implementation, and review of the 1995 Plan and will continue to actively engage in issues to protect water quality in the Delta.

Throughout this review process, CCWD's concern has been to protect water quality. CCWD appreciates the State Water Board's evaluation of the evidence provided by CCWD and other agencies and incorporation of CCWD's recommendations into the amended Plan so that current water quality protections are maintained. In any future consideration of modifications to the Plan, we look forward to working with the State Water Board to ensure that any changes are in accord with the State Water Board's anti-degradation policy and the principle that protecting drinking water quality is of paramount importance.

Although the State Water Board took no direct action, CCWD will continue to advocate the establishment of an objective to protect drinking water and public health. As the CALFED Water Quality Program and the Central Valley Drinking Water Policy develop additional information regarding drinking water protections, CCWD encourages the State Water Board to reconsider amending the Plan with numerical objectives targeting precursors to disinfection byproducts.

With respect to compliance of the chloride objective at the Contra Costa Canal Pumping Plant No. 1, CCWD agrees that adequate information to date has not been provided to warrant changing the objective. As described in CCWD's 2005 letter (CCWD-EXH-021):

CCWD requests that the compliance location remain at Pumping Plant #1. However, CCWD is willing to entertain the concept of a reasonable monitoring agreement based on Holland Tract EC, as discussed in its January 10, 2005 letter (CCWD-EXH-014):

The Pumping Plant #1 compliance location (C-5) must remain unchanged at the Contra Costa Canal Pumping Plant #1 to ensure water diverted by CCWD from Rock Slough is at or better than the 150 mg/l and 250 mg/l M&I chloride objectives. These objectives provide protection against salinity intrusion to all M&I diversion points in the southern and central Delta, and are necessary to ensure water quality protection at those Delta M&I diversion points, including CCWD's Old River intake.

In the near future, the circumstances in which local degradation leads to exceedances of water quality objectives in Rock Slough will be minimized by three factors, discussed at length during the presentation of Dr. David Briggs on January 10, 2005. (Reporter's Transcript 569:24-585:23; CCWD-EXH-07.) These factors are Veale Tract improvements, Contra Costa Canal Encasement, and in the longer term, increased use of Pumping Plant No. 1 to meet increases in CCWD demands. ... The objective needs to remain where the beneficial uses can best be protected.

However, as stated in CCWD's March 8, 2005 letter (CCWD-EXH-19), in the event that there is an exceedance of either chloride objective and the 3-day running average diversion rate at the Contra Costa Canal is less than 30 cubic feet per second, CCWD would be willing consider such an exceedance beyond the control of the State Water Project and Central Valley Project, provided the the daily EC at Holland Tract, measured three days previously, was 0.94 mS/cm or less (in the case of the 250 mg/l chloride objective) or 0.56 mS/cm or less (in the case of the 150 mg/l chloride objective).

The above description underscores the difference between moving the compliance location and identifying and accounting for conditions that are beyond the responsibility of the State Water Project (SWP) and Central Valley Project (CVP), while maintaining the objective at Pumping Plant #1.

Working collaboratively with other stakeholders, CCWD has made substantial progress in reducing local water quality degradation. The CALFED Rock Slough Water Quality Improvement Project was completed in January 2006, and eliminated drainage from Veale Tract into Rock Slough and reduced the impact of local agricultural drainage. Additionally, CCWD is proceeding with the first phase of the Contra Costa Canal Replacement Project that eliminates the biggest source of salinity in the westernmost

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part of the Canal. Finally, CCWD and the Department of Water Resources (DWR) are working to secure funding and develop methods to eliminate seepage from the Dutch Slough Property (owned by DWR) into the Canal.

As the progress from these local source water improvement programs is evaluated, CCWD will continue to work collaboratively with other stakeholders on determining when conditions exist that are beyond the control and obligations of the SWP and CVP, with the objective of improving the efficiency of the SWP and CVP while at the same time protecting CCWD's water quality and water quality in the south Delta.

If you have any questions, please call me at (925) 688-8073.

Sincerely,



David A. Briggs  
Water Resources Manager

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cc: Carl Nelson (BPMNJ)