



**CONTRA COSTA
WATER DISTRICT**

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April 15, 2005

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Ms. Debbie Irvin, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812

CCWD comments on Issue 10, Southern Delta Electrical Conductivity

Dear Ms. Irvin:

Contra Costa Water District (CCWD) appreciates this opportunity to comment on the southern Delta electrical conductivity objectives as part of the State Water Resources Control Board (SWRCB) Periodic Review of the 1995 Bay-Delta Water Quality Control Plan (1995 Plan). CCWD strongly opposes changing the current south Delta electrical conductivity (EC) objective¹ of 0.7 EC for April through August – which finally took effect 10 years after being established in the 1995 Plan – back to 1.0 EC.² This would constitute backsliding in contradiction of anti-degradation policies of the SWRCB and the federal government, allowing further degradation of water quality in the south Delta and resulting in direct adverse impacts on drinking water quality for CCWD's customers, as well as the customers of the Central Valley Project and the State Water Project.

Relaxing the existing 0.7 EC requirement in the south Delta to 1.0 EC will, at certain times, dramatically increase Delta salinity. For example, 0.7 EC at CCWD's Old River intake near Highway 4 is equivalent to a chloride concentration of 150 mg/L chloride. An EC of 1.0 at the Old River intake is equivalent to about 235 mg/L (representing an increase in chloride concentration of 85 mg/L).

By way of comparison, as CCWD has previously noted, the current M&I chloride objective of 150 mg/L is woefully insufficient to protect drinking water quality, having originally been intended to protect cardboard box manufacturing, not public health.

¹ To be met at San Joaquin River at Airport Bridge, Vernalis; San Joaquin River at Brandt Bridge site; Old River near Middle River; and Old River at Tracy Road Bridge

² As discussed by the South Delta Water Agency during the workshop, the May 1995 Water Quality Control Plan required that the southern Delta EC objectives be implemented by December 31, 1997 (Footnote 5 in the 1995 Plan). Thereafter, Decision 1641 further delayed implementation of the 0.7 EC objective until April 1, 2005. Water quality in the South Delta was an issue long before the 1995 Plan, as shown by the San Joaquin River Group's presentation of evidence taken from the proceedings leading up to D-1485, and the ruling of the so-called *Racanelli* decision that "the agricultural standard for the southern Delta was not established in the manner required by law." (*United States. v. State Water Resources Control Bd.* (1986) 186 Cal.App.3d 82, 123.)

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Relaxing the EC requirement in the south Delta could increase the concentration of bromide, a disinfection byproduct precursor, at Delta drinking water intakes. During review of Issue 4, M&I chloride objectives, CCWD requested the SWRCB adopt a new bromide objective that protects drinking water quality achieved through implementation of CALFED Bay-Delta Program water quality projects, including intake relocation, on a time schedule consistent with those projects. CCWD has suggested a 300 µg/L bromide objective is attainable, either at one of CCWD's Delta intakes or CCWD's proposed alternative intake on Victoria Canal, without additional water supply costs. By way of comparison, at CCWD's Old River intake, an EC of 0.7 is equivalent to a bromide concentration of about 500 µg/L, which is already well in excess of the 300 µg/L drinking water objective requested by CCWD.

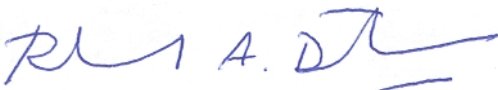
This SWRCB has long recognized the need to do something to protect South Delta water quality. On page 28 of D-1485, the SWRCB stated that if an agreement "concerning the construction of physical facilities and other measures for long-term protection of southern Delta agriculture ... is not executed by January 1, 1980, the Board will examine in detail southern Delta water rights, determine the causes and sources of encroachment and take appropriate action." The SWRCB began this process in earnest in 1989 with the extensive scientific analysis of the water quality needs of the south Delta farmers conducted by the SWRCB's South Delta Agriculture Workgroup. The information developed through this process and others like it established the basis for the 0.7 EC objective that was included in the 1995 Plan. Although achieving compliance was relatively complex process, the expectation clearly was that this objective would and should be implemented.

In conclusion, the 0.7 EC objective, which is now finally in effect, not only provides protection of water quality for southern Delta agriculture, as intended, but also provides some measure of incidental protection of water that is withdrawn elsewhere in the Delta for drinking water, by CCWD and by the urban agencies that receive water from the State and Federal export pumps. CCWD supports the continued implementation of the 0.7 EC.

CCWD therefore requests that the State Board not allow further degradation of the southern Delta and that the State Board retain the 0.7 mmhos/cm southern Delta electrical conductivity objectives in the water quality objectives for agricultural beneficial uses (Table 2 of the 1995 Plan).

If you have any questions regarding CCWD's comments, please call me at (925) 688-8187.

Sincerely,

A handwritten signature in blue ink, appearing to read "Richard A. Denton". The signature is stylized and includes a horizontal line at the end.

Richard A. Denton
Water Resources Manager

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cc: Ron Milligan (USBR)
Amy Aufdemberge (DOI)
Cathy Crothers (DWR)
Ken Landau (CV RWQCB)
Carl Nelson (BPMNJ)