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December 30, 2013

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Jeanne Chilcott  
California Regional Water Quality Control Board  
Central Valley Region  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670

**Subject: Scoping Comments on the Development of the Central Valley Wide Salt and Nitrate Management Plan**

Dear Ms. Chilcott:

Contra Costa Water District (CCWD) appreciates the opportunity to comment on the development of the Central Valley Wide Salt and Nitrate Management Plan for incorporation into the Sacramento-San Joaquin and Tulare Lake Basin Plans. In the Substitute Environmental Document (SED), the Central Valley Regional Water Quality Control Board (the Board) must analyze any potential adverse environmental effects associated with the proposed amendment. We hope the following comments will be helpful in selecting alternatives and environmental impacts that will be considered in the SED.

**Alternatives for Consideration**

No alternative that incorporates the concept of controlled degradation into the Sacramento-San Joaquin River Basin Plan should be considered. CCWD provides nearly 500,000 people drinking water from the Sacramento-San Joaquin Delta and has spent almost a billion dollars in the past two decades to improve the water quality delivered to our customers. Increasing degradation of water feeding into the Delta could degrade water quality delivered to our customers and/or cost CCWD additional water and money to maintain the high quality of water delivered. Controlled degradation is also potentially inconsistent with California's anti-degradation policy.

No alternative that would remove secondary Maximum Concentration Limits (MCLs) from the Basin Plan and replace them with narrative objectives should be considered, as this also could degrade drinking water quality for CCWD's customers and is contrary to the anti-degradation policy. Furthermore, the use of the lowest numeric value secondary MCLs as objectives in the Basin Plans should be continued. Secondary

MCLs address taste and odor of drinking water and are the primary way consumers evaluate the safety of water they are consuming. As noted above, CCWD has made significant investments to protect and enhance the water quality delivered to our customers and we urge the Board to consider alternatives that would not jeopardize CCWD's investments nor impact customer's water quality.

### **Potential Re-Directed Impacts**

Many of the alternatives under consideration for inclusion in the Basin Plan SED could impact downstream water users. Numeric salinity objectives in the Sacramento-San Joaquin Delta are set by the State Water Resources Control Board's Decision 1641 (D-1641), including those for the San Joaquin River at Vernalis and for CCWD's Rock Slough Pump Plant #1. Joint operation of the Central Valley Project (CVP) and the State Water Project (SWP) is required to ensure compliance with these objectives. If waters upstream of Vernalis are allowed to degrade, releases from New Melones Reservoir could be required to maintain the water quality objective at Vernalis. An increase in releases from the reservoir could affect the water supply reliability of both CVP and SWP contractors as well as decrease the amount of water available in storage to protect other beneficial uses such as fish and wildlife. Similarly, degradation at the Rock Slough Pump Plant could require additional releases from upstream reservoirs such as Shasta and Oroville.

Furthermore, CCWD's operations are controlled by salinity at our Sacramento-San Joaquin Delta intakes. If Delta salinity increases, even in the absence of objectives exceedences, there are potential adverse impacts on CCWD's water quality, water supply, and finances.

Alternatives considered in the SED should quantify re-directed impacts to other water users. Daily changes in water quality on the San Joaquin River at Vernalis, at other D-1641 compliance points, and at CCWD's Delta intakes should be quantified and disclosed in the SED, as should any re-operation of the CVP and SWP caused by those water quality changes.

CCWD looks forward to reviewing the Salt and Nitrate Management Plan and the accompanying SED once it is available. If you have any questions regarding our comments please call me at (925) 688 – 8083 or Maureen Martin at (925) 688 – 8323.

Sincerely,



Leah Orloff  
Water Resources Manager

LO/jc

cc: Cindy Paulson - Executive Director, CUWA