



**CONTRA COSTA
WATER DISTRICT**

1331 Concord Avenue
P.O. Box H20
Concord, CA 94524
(925) 688-8000 FAX (925) 688-8122

March 7, 2005

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

Directors

Joseph L. Campbell
President

Elizabeth R. Anello
Vice President

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Karl L. Wandry

Walter J. Bishop
General Manager

**RE: Clarification of CCWD's comments on Issue 4c, New Objectives to Protect
Drinking Water Quality**

Dear Ms. Irvin:

In its February 14 comments on Issue 4c, Contra Costa Water District (CCWD) requested that the State Water Resources Control Board adopt a new bromide objective of 300 µg/L that CCWD believes would be protective of drinking water quality and that would be attainable through a series of CALFED projects now planned. To clarify the February 14th letter, CCWD did not intend that this new bromide objective would necessarily be applied at all the urban drinking water intakes in the Delta. Rather, CCWD intended to request that a new bromide objective be applied at CCWD's intakes, which would be attainable with the implementation of CALFED's planned projects. CCWD requests that the new objective protect CCWD source water quality, but only in a way that provides protection in a balanced fashion (for example, at one of CCWD's Delta intakes or future intakes). Applicability and attainability at other intakes will depend on the efforts of those diverting at those locations, and on the water quality improvement available under the CALFED program.

CCWD believes that with a new Delta intake at the western end of Victoria Canal¹, and implementation of other CALFED water quality improvement actions such as the San Joaquin River water quality management plan and modification of Franks Tract, a 300 µg/L daily bromide objective would be readily achievable at one or more of CCWD intakes without additional water supply cost.

Achievement of a protective bromide objective in this fashion would be on a schedule compatible with the Central Valley Regional Water Quality Control Board's Central Valley Drinking Water Policy and the work of the California Bay-Delta Authority in implementing actions to restore and continuously improve water quality, and should not require additional restrictions on water facility operations.

¹ CCWD's Alternative Intake Project was included as an authorized project in the October 2004 federal authorization bill for CALFED (Public Law 108-361 §103 (f)(1)(E)). The Notice of Preparation / Notice of Intent for the project was issued on January 25, 2005 (Federal Register Vol. 70, No. 15, Tuesday, January 25, 2005, pages 3557-3558). The project schedule calls for adoption of a Final Environmental Impact report / Environmental Impact Statement in Spring 2006. The intake relocation project could be on line in mid-2009.

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As discussed in CCWD's February 14 letter, CCWD requests that the SWRCB:

1. Include a detailed analysis in the Water Quality Control Plan for different alternatives for protecting source water for drinking water as a beneficial use of Delta water, including different bromide objectives.
2. Adopt a new bromide objective that protects drinking water quality achieved through implementation of CALFED water quality projects, including intake relocation, on a time schedule consistent with those projects. In particular, CCWD believes 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.

If you have any questions, 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

cc: Chester V. Bowling (USBR)
Amy Aufdemberge (DOI)
Cathy Crothers (DWR)
Ken Landau (CV RWQCB)
Carl Nelson (BPMNJ)