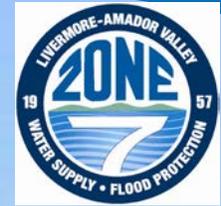




CONTRA COSTA
WATER DISTRICT



Drinking Water Protection

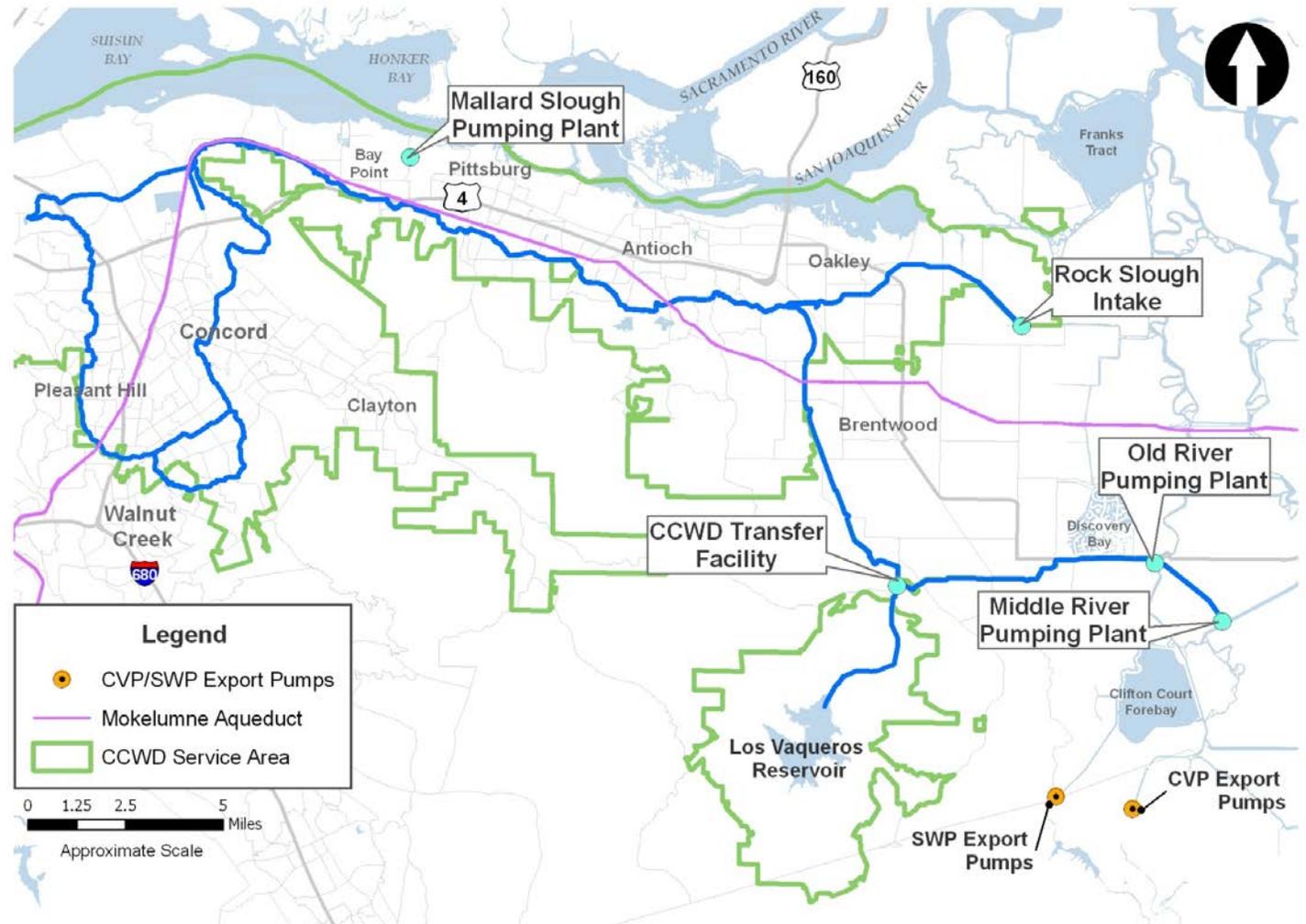
Public Workshop to Discuss Proposed Basin Plan
Amendments for a Central Valley-Wide Salt and Nitrate
Control Program

January 19, 2018

Contra Costa Water District



- CUWA member agency
- In-Delta Diverter
- 500,000 customers
- Central and Eastern Contra Costa County
- Water quality determines CCWD operations



Zone 7 Water Agency



- CUWA member agency
- Treated water wholesaler for Eastern Alameda County
- Untreated agricultural supplier (primarily used for vineyard irrigation)
- South Bay Aqueduct provides majority of source water (75-80%)
- Surface water is most vulnerable since it travels through the Delta



Comments on Proposed BPA



- We appreciate the effort of the Board, Board staff, and CV-SALTs participants in seeking a long-term solution for the salt and nitrate issues in the Central Valley
- Source water should be protected in ALL phases of this process
- Key concerns
 - Increased salinity impacts on drinking water intakes in the Delta
 - No comprehensive monitoring program

Concerns on Salinity Impacts



- Salt Control Program
 - For the alternative salinity permitting approach, reasonable water quality objectives should be established to protect beneficial uses in ALL phases
- Salinity Variance Program
 - The Program should not be applied to salinity standards for municipal and domestic supply (MUN) beneficial use
 - The extension of the Program should only be as long as necessary to determine how to meet water quality objectives

Concerns on Salinity Impacts (cont.)



- Secondary Maximum Contaminant Level Policy
 - “Recommended” level
 - Is “desirable for a higher degree of customer acceptance” (Section 64449 of Title 22)
 - The “Recommended” salinity level should be applied as the water quality objective
 - “Upper” level
 - Is “acceptable if neither reasonable nor feasible to provide more suitable waters” (Section 64449 of Title 22)
 - The “Upper” level should not be applied as the basin-wide water quality objective

Concerns on Salinity Impacts (cont.)



- Drought and Conservation Policy
 - The “Short Term” salinity level of SMCLs is “acceptable only for existing community water systems on a temporary basis pending construction of treatment facilities or development of acceptable new water sources” (Section 64449 of Title 22)
 - Drought and conservation do not fit into the definition of “temporary basis”
 - The “Upper” level should be applied as the water quality objective for drought and conservation to protect beneficial uses

Monitoring Program



- A comprehensive monitoring program is necessary to establish the existing baseline and to assess the impacts of the Basin Plan Amendments
- We suggest a plan be added to guide permit-by-permit monitoring programs and to eventually accomplish a basin-wide program in the near future

Thank You



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