

Contra Costa Water District Comments on Phase 1 SED

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Maureen Martin, Ph.D.



Overarching Concerns

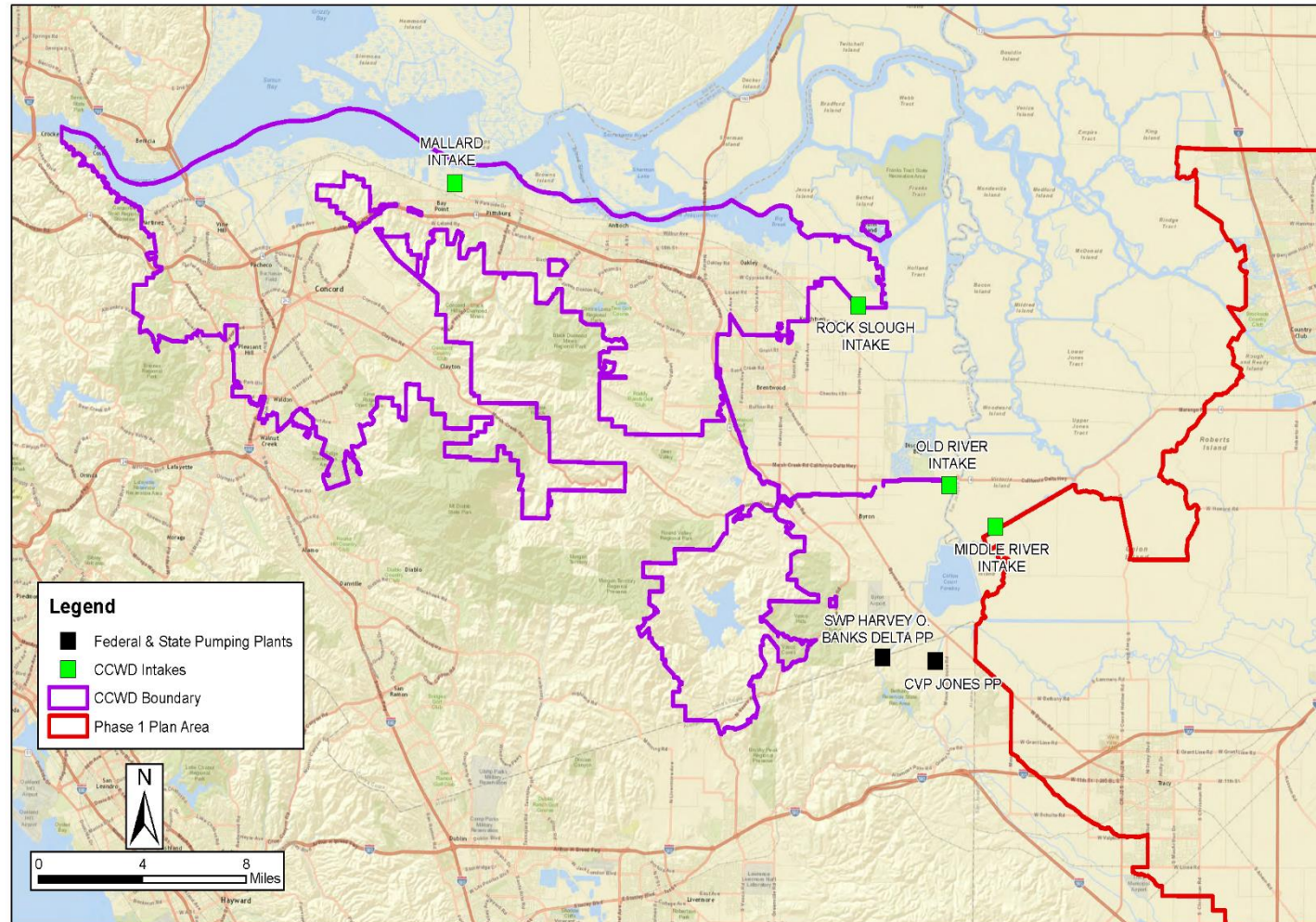


1. CCWD's key concern is water quality at our Delta intakes
2. Phase 1 has the potential to degrade Delta water quality
3. Phase 1 SED is inadequate because it did not evaluate the full range of potential Delta water quality impacts
4. CCWD requests that water quality management plans be required for all operational and adaptive management plans in the WQCP

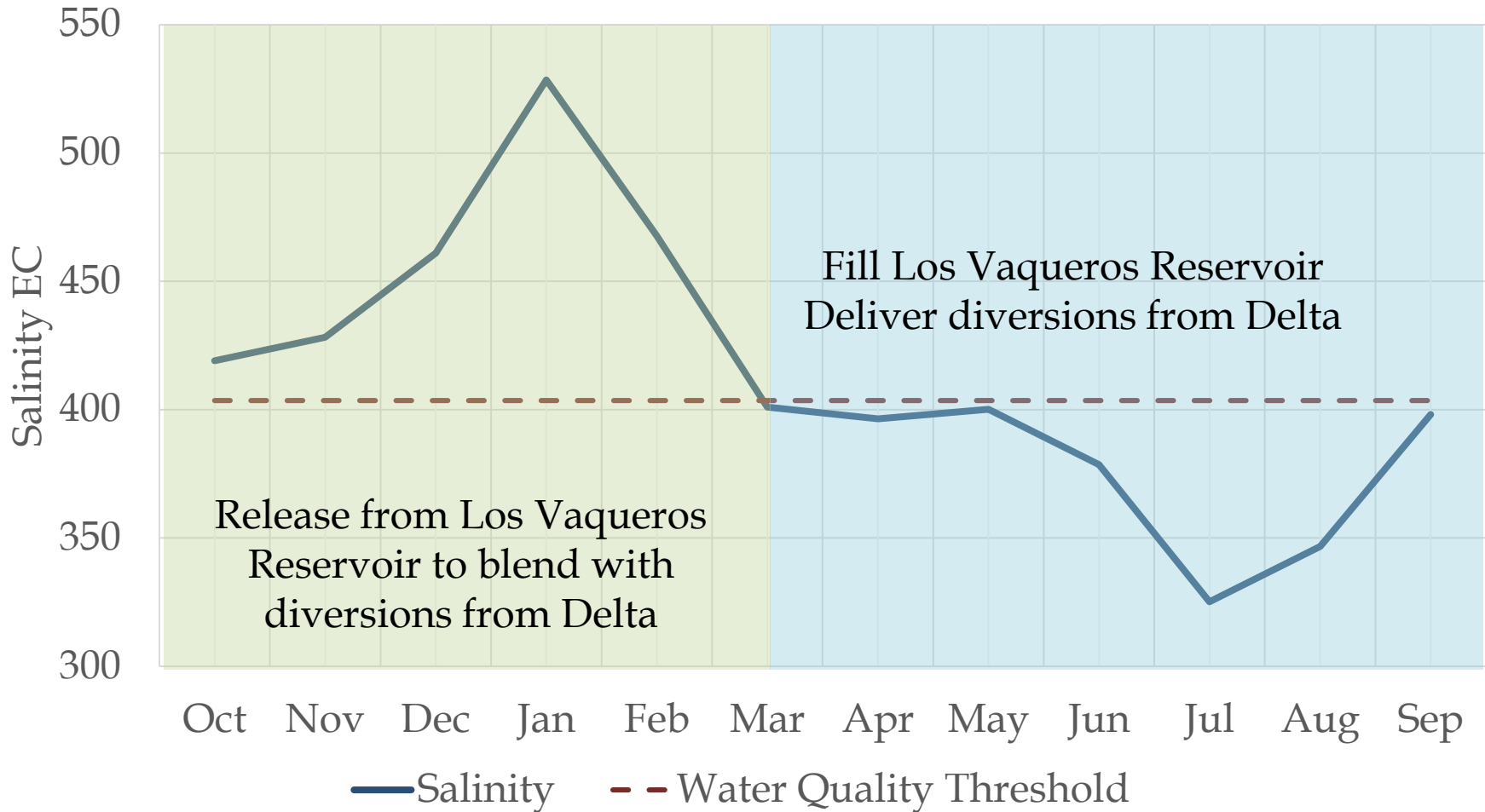
CCWD Background



- 100% reliant on Delta diversions
- Operations are based on Delta water quality
- Serve over 500,000 residents in Contra Costa County
- Evaluating expansion of Los Vaqueros Reservoir to provide regional supply reliability & environmental benefits



CCWD Operations Based on Salinity

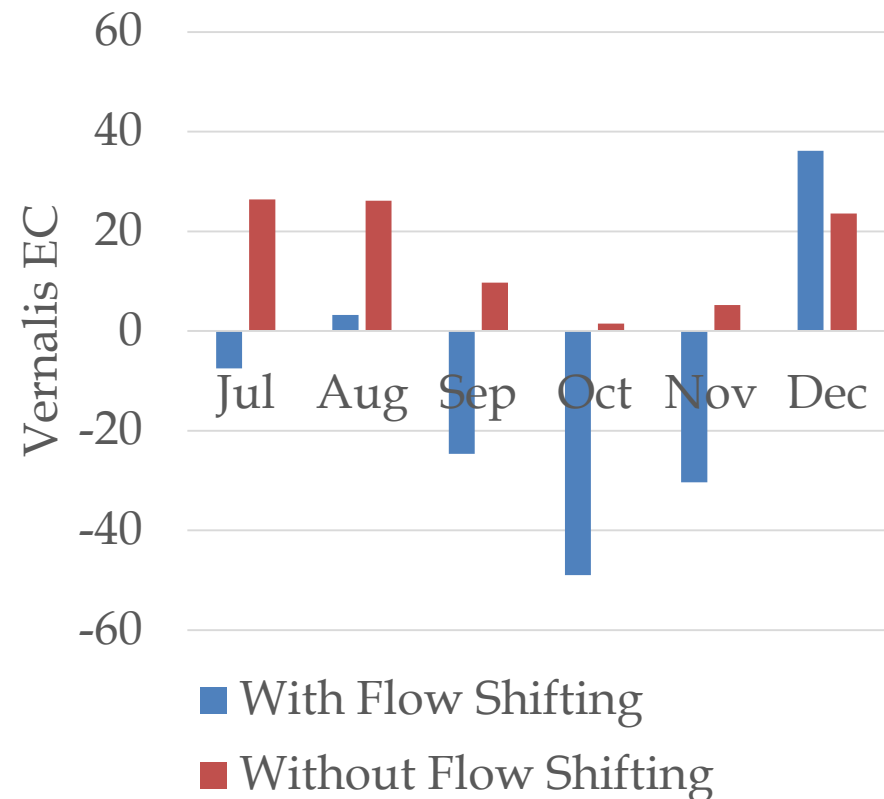


Phase 1 has Potential to Degrade Delta Water Quality



- Key SED assumptions cannot be implemented because they require perfect foresight
- Adaptive management & other actions act as de-facto mitigation but are not required
- Full range of potential operations not modeled
- Assumes historical flow-EC relationship at Vernalis despite increased groundwater usage

Change in Vernalis EC - 40% Unimpaired



SED is Inadequate



- Baseline does not reflect existing conditions
 - Includes VAMP despite its expiration in 2011
 - Does not include San Joaquin River Restoration Flows
 - Baseline salinity is biased high at Brandt Bridge & Union Island
- Did not evaluate potential water quality impacts in the Delta outside of the south Delta compliance points
- Did not evaluate changes in Delta operations
- Deferring evaluation of changes in Delta until Phase 2 is not sufficient

CCWD Request



- Perform adequate SED modeling by including:
 - Baseline that reflects current conditions
 - Full range of potential water operations
 - Analysis of changes in Delta water quality & operations
 - Range of potential impacts
 - Mitigation, not adaptive management, to minimize impacts

CCWD Request



- Require water quality management plans to ensure that Delta water quality will not degrade
 - The STM's adaptive comprehensive operations plan and annual management plans should include a water quality management component, developed in collaboration with CCWD
 - A complementary water quality management plan will be needed in Phase II of the WQCP update