



**CONTRA COSTA
WATER DISTRICT**

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March 8, 2005

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

RE: Response to State Water Contractors' February 14 comments on Issue 4b

Dear Ms. Irvin:

CCWD has reviewed the State Water Contractors' (SWC) February 14, 2005 comments on the monitoring location for the 150 and 250 mg/L chloride objectives. The SWC have not accurately represented the CCWD's request for specific Holland Tract electrical conductivity criteria, primarily by suggesting incorrectly that CCWD is seeking "a double barrier of protection when it asks for water quality objectives lower than those proposed by DWR and the USBR."

There are two important reasons why the Holland Tract salinity levels as proposed by DWR and the USBR do not provide sufficient protection for the beneficial uses protected by the 150 and 250 mg/l chloride objectives.

The first is evident from reviewing the "scatter plots" presented by DWR an Reclamation on January 10, 2005: a significant number of the data points shown on the plot are above the proposed in-lieu salinity level; this necessarily means that each of these data points represents a violation of the 150 mg/L and 250 mg/L objectives at the Contra Costa Canal Pumping Plant #1. CCWD's proposed water quality criteria at Holland Tract are necessary to ensure the 150 mg/L and 250 mg/L objectives are met at the Contra Costa Canal Pumping Plant #1.

The second is that the Holland Tract salinity levels as proposed by DWR and the USBR address only the operational variations and the effects of "winds, tides and other factors" (the '**operational buffer**' referred to by the SWC in their February 14 letter). To ensure the 150 mg/L and 250 mg/L objectives at the Contra Costa Canal Pumping Plant #1 will be achieved, any proposed Holland Tract salinity levels must also allow for general water quality degradation between Holland Tract and the entrance to the Contra Costa Canal from agricultural discharges to both Old River and Rock Slough, not just from Veale Tract (which could be called a '**degradation buffer**').

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This degradation has been present since before the 1940s, and affects all locations in the Delta, not just Rock Slough water quality, and it affects the Rock Slough water quality whether or not CCWD is diverting from Rock Slough. Meeting the Pumping Plant #1 objective despite this generalized degradation is fully within the control of the State Water Project and Central Valley Project and is independent of CCWD's diversion rate.

The conceptual basis for the proposed method for determining whether compliance is fully within the control of the SWP and CVP is to isolate the effects of local seepage into the Contra Costa Canal near Pumping Plant #1 and trapping of water of poor quality in the Canal at low pumping rates from the '**operational buffer**' and the '**degradation buffer**,' which have always part of the operational strategy used by DWR and Reclamation to control chloride levels at Pumping Plant #1. CCWD acknowledges that it is not possible for DWR and Reclamation to provide additional buffers to fully address the effects of local seepage into the Contra Costa Canal near Pumping Plant #1 under very low CCWD diversion rates.

In conclusion, as described above and in more detail during CCWD's presentations to the SWRCB on January 10, 2005, the Holland Tract EC levels proposed by CCWD are indeed needed to ensure the SWRCB's chloride objectives at Pumping Plant #1 are fully met.

CCWD reiterates that the Contra Costa Canal Pumping Plant #1 compliance location (C-5) must remain at Pumping Plant #1 to ensure water diverted by CCWD from Rock Slough is at or better than the 150 mg/L and 250 mg/L M&I chloride objectives. However, to account for local degradation beyond the control of DWR and Reclamation, CCWD requests the following language be incorporated into the new Plan, either as an implementation matter under Issue 11 or as a footnote to the existing M&I chloride objective language (Table 1 of the May 1995 Plan):

An exceedance of the 250 mg/L chloride objective will be considered not fully within the control of DWR and Reclamation if the 3-day running average diversion rate at CCWD Pumping Plant #1 is less than 30 cfs, and the daily EC at Holland Tract, measured three days previously, was 0.94 mS/cm or less. An exceedance of the 150 mg/l chloride objective will be considered to be not fully within the control of DWR and Reclamation if the 3-day running average diversion rate at Pumping Plant #1 is less than 30 cfs, and the daily EC at Holland Tract, measured three days previously, was 0.56 mS/cm or less.

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

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