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July 14, 2005

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

**Subject: Response to State Water Contractors' June 4 Closing Statements
on Issue 4b, 150 mg/L and 250 mg/L Chloride Objectives**

Dear Ms. Irvin:

Contra Costa Water District (CCWD) wishes to clarify an issue in the State Water Contractors' (SWC) June 4, 2005 closing statements regarding the monitoring location for the 150 milligrams per liter (mg/L) and 250 mg/L chloride objectives (Periodic Review Issue 4b), as explained below.

The SWC statement recommends that the State Water Resources Control Board (Board) establish an additional compliance location for the chloride objectives (p.11). The discussion goes on to imply that CCWD, DWR and Reclamation have reached agreement on this issue, but not on the details of equivalent EC values and channel flow rate.

In fact, CCWD does not agree to the establishment of an additional compliance location. We have proposed that, under certain conditions, a water quality monitoring station at Holland Tract be used to determine whether DWR and Reclamation are fully responsible for water quality violations at the Pumping Plant #1 compliance location. But CCWD has never agreed that compliance should be determined at Holland Tract or any other location east of Pumping Plant #1. To do so would be to weaken the existing water quality objective. This point was explained previously in CCWD's letters to the Board on Issue 4b dated February 14, 2005 and March 8, 2005.

With the above clarification, CCWD agrees with the SWC suggestion (p. 12) that additional discussion among the interested parties may result in an agreement on the remaining technical details. Therefore, we suggest that it is appropriate for the Board to postpone a decision on this issue until the supplementary water rights hearing, to allow full opportunity for an agreement among the parties.

Ms. Debbie Irvin, Clerk to the Board
Response to State Water Contractors' June 3 Closing Statements on Issue 4b
July 14, 2005
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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 fluid and cursive, with a large initial "R" and "D".

Richard A. Denton
Water Resources Manager

RAD/MM:wec

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