

**DEPARTMENT OF WATER RESOURCES**

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February 16, 2005

Ms. Debbie Irvin, Clerk to the Board  
Executive Office  
State Water Resources Control Board  
Cal/EPA Headquarters  
1001 "I" Street  
Sacramento, California 95814

Comments on Workshop Regarding Revisions to the 1995 Bay-Delta Water Quality  
Control Plan, Topic 4

Dear Ms. Irvin:

The Department of Water Resources (DWR) and the Bureau of Reclamation submit the enclosed comments on the State Water Resources Control Board Workshop regarding revisions to the Bay-Delta Water Quality Control Plan and the location of the compliance monitoring station at Pumping Plant Number 1 and new water quality objectives for drinking water (Topic 4 of the Workshops).

Please contact me at (916) 653-5613 or Amir Rangchi at (916) 657-5084 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Cathy Crothers".

Cathy Crothers  
Senior Staff Counsel

Enclosures

cc: (See attached list.)

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**Department of Water Resources and U.S. Bureau of Reclamation  
Joint Comments on Topic 4 of the  
SWRCB Workshop on Amending the 1995 WQCP**

The Department of Water Resources (DWR) and U.S. Bureau of Reclamation submit these joint comments as a follow-up of the State Water Resources Control Board (SWRCB) Workshops on Topic 4, which reviewed recommendations for changes to municipal and industrial water quality objectives in the 1995 Water Quality Control Plan (WQCP). During the January Workshop DWR and Reclamation presented comments on the relocation of the compliance location for chlorides at Contra Costa Canal Pumping Plant #1 (PP#1) and on new drinking water quality objectives in the Delta. Based on comments made at the Workshops, DWR and Reclamation recommend that the SWRCB not change the water quality objectives at PP#1 nor add new drinking water quality objectives in the Delta. However, we recommend revisions to the Program of Implementation and the Table 4 (Water Quality Compliance and Baseline Monitoring) of the WQCP.

**PP#1 Chloride Objective and Compliance Location**

During the Workshop DWR and Reclamation presented information showing that under certain conditions the CVP and SWP are unable to reasonably affect water quality at PP#1. These conditions are due to: (1) changes in Contra Costa Water District (CCWD) operations of the pumping plant since Los Vaqueros Reservoir Intake began diversions in 1997, and (2) influence of local drainage into Rock Slough. Both of these factors are outside the control of DWR and Reclamation. At the Workshop DWR and Reclamation recommended that the SWRCB amend the WQCP to provide a second way to achieve the 250 and 150 mg/l Chloride Objectives at PP#1 by adding a second compliance location for these objectives in Old River, a location that the CVP and SWP can reasonably control. SWRCB members and staff suggested that the concerns raised by DWR and Reclamation be addressed through implementation of the water quality objectives during a water rights hearing rather than through changes to the water quality objective. DWR and Reclamation agree with this approach and recommend that the SWRCB not change the 150 and 250 mg/L Chloride objective at PP#1. However, we request that the SWRCB modify the Program of Implementation in the WQCP to clearly indicate that implementation of the PP#1 objective would be addressed through changes to water rights, waste discharge permits, and other programs, such as the CALFED Bay-Delta program to reduce agricultural drainage into sloughs in the area. DWR recommends the SWRCB consider implementation that would be phased, such as shown in the following proposed modifications to Chapter IV, section B of the WQCP:

1. First paragraph, first sentence, replace "four" with "five".

2. Add to first paragraph, end of second sentence:  
"and (5) the chloride objectives for municipal drinking water quality at PP#1."
3. Add the following new paragraph 5 at end of section B:

"5. PP#1 Chloride Objectives for Municipal Water Quality. Multiple factors contribute to elevated levels of chloride in Rock Slough and at PP#1, including ocean based salts intruding in the Delta, discharges of land-derived salts from local drainage, reduced circulation of water in Rock slough, and CCWD diversion operations at Los Vaqueros Reservoir Intake. Feasible measures to implement the chloride objectives at PP#1 include: (1) regulating salinity intrusion of ocean water in the Delta at Old River, (2) regulating local discharges of land derived salts found in drainage water, (3) maintaining adequate circulation in Rock Slough. Implementation of the chloride objectives at PP#1 shall be phased so that different causes of the elevated salinity shall be addressed as soon as reasonably feasible. Presently, Reclamation and DWR are responsible for achieving the water quality objectives at PP #1. The first phase of implementation will require Reclamation and DWR to be responsible for achieving the water quality objectives at PP #1 except under conditions of low circulation within Rock Slough, when other factors are the basis for elevated salinity. During conditions of low circulation, implementation will be achieved by assigning partial responsibility to Reclamation and DWR as measured at a monitoring location in Old River near Holland Tract. A subsequent phase of implementation will require other entities to share in achieving the objective through other measures, such as adoption of waste discharge requirements to reduce discharges that contribute to elevated salinity. Before such waste discharge requirements are imposed, the SWRCB will review the effects of the CALFED Bay-Delta agricultural drainage projects within the Rock Slough and Contra Costal Canal area. The CALFED project to relocate drainage from Veal Tract is scheduled to be implemented in 2005 and the lining of Contra Costa Canal may occur in 2006. These projects will improve local water quality conditions in the area and help implement the objective at PP #1."

In addition, DWR and Reclamation request that the SWRCB revise Table 4 of the 1995 WQCP to include a baseline monitoring station in Old River at Holland Tract. DWR and Reclamation currently operate a monitoring station at this location and historically have used this monitoring as a point of operational control to achieve the chloride objectives at PP#1. Also, many of the data used to develop the information presented during the Workshop on Topic 4 were collected at this station. Reclamation and DWR believe this location in Old River at Holland Tract should be added to the WQCP as an appropriate monitoring location that could be referred to later during a water rights hearing on modifying the method of implementing the water quality objective at PP#1. If during the water rights hearing the SWRCB determines that a second compliance location

should be established for implementing the water quality objective at PP#1, the baseline monitoring station would be used for compliance and the WQCP would then be updated at a later time. Or, if appropriate, the SWRCB could modify Table 4 during these proceedings to amend the WQCP to include the station as a compliance monitoring station which would be implemented at a later time.

**New Water Quality Objectives for M&I**

DWR and Reclamation believe that the information presented during the Workshop support the recommendation to not adopt new water quality objectives for M&I beneficial uses in the Delta. This information included presentations by the California Bay Delta Authority (CBDA) and the subcommittee on drinking water quality of the Bay Delta Authority Public Advisory Committee that explained their work related to developing drinking water quality criteria for the Delta. DWR and Reclamation recommend that the SWRCB consider the results of the CBDA investigations before addressing new objectives for drinking water quality in the Delta.