



**CONTRA COSTA  
WATER DISTRICT**

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February 18, 2005

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

**RE: Issue 5a: Delta Outflow Objective**

Dear Ms. Irvin:

Contra Costa Water District (CCWD) offers the following comments on Issue 5, Delta Outflow Objectives, of the State Water Resources Control Board's Periodic Review of the 1995 Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (1995 Plan).

Drinking water protection provided by X2 objective must not be degraded

As discussed by Dr. Gregory Gartrell during CCWD's January 10, 2005 presentation on Issue 4c, Potential New Drinking Water Quality Objectives, the estuarine habitat objective for protection of fish and wildlife beneficial uses (Table 3 of the 1995 Plan) provides more protection of drinking water quality than the current 150 mg/L and 250 mg/L municipal and industrial objectives at CCWD's Contra Costa Canal Pumping Plant #1 intake. This protection should not be degraded.

Flexibility in meeting the X2 objectives needs to be constrained to prevent water quality degradation

If the SWRCB does allow the State Water Project and Central Valley Project flexibility in meeting the X2 objectives, that flexibility should be constrained so that Delta outflow is not reduced if the Delta outflow is less than 15,000 cubic feet per second. This provides the necessary flexibility without compromising drinking water quality.

This constraint or "sideboard"<sup>1</sup> will preserve the water quality protections of the X2 objectives in the 1995 Plan. Seawater intrusion is not noticeable at Delta drinking water intakes, including CCWD's Contra Costa Canal Pumping Plant #1, when Delta outflows remain above 15,000 cfs. At lower outflows, water quality will begin to degrade without substantial improvement in flexibility.

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<sup>1</sup> The term "sideboard" was used during the January 12, 2005 workshop to describe limits on flexing the Delta outflow objectives in Table 2 of the 1995 Plan.

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Note this Delta outflow constraint only addresses protection of drinking water quality. Other "sideboards" will be needed to ensure Delta fisheries would continue to be protected if the State Water Project and Central Valley Project were allowed additional flexibility in meeting the Port Chicago X2 objective.

The Collinsville X2 objective should not be relaxed any further than currently allowed in the 1995 Plan

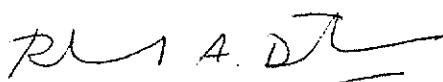
The U.S. Department of Interior's January 12, 2005 statement on Issue 5 (on page 3) discusses challenges meeting the Collinsville X2 objective in the late spring during drier years. Footnote 14 to Table 3 of the 1995 Plan (page 21) requires that the Collinsville X2 objective be met either as a minimum 3-day running average Delta outflow of 7,100 cfs, or a daily average or 14-day running average EC of less than or equal to 2.64 mmhos/cm (Collinsville station C2). However, the 1995 Plan already contains a relaxation of the Collinsville objective in May and June if the best available May estimate of the Sacramento River Index (described in footnote 6) is less than 8.1 MAF at the 90% exceedence level. Under this circumstance, a minimum 14-day running average flow of 4,000 cfs is required in May and June.

Reducing Delta outflow from 7,100 cfs to 4,000 cfs represents a significant degradation of water quality at Delta drinking water intakes, including CCWD's Delta intakes. There has already been substantial degradation of water quality over the past twenty years without this additional burden. For example, from 1944 to 1984, water quality in the fall was better than 100 mg/l chlorides 70% of the time and worse than 150 mg/l only 5% of the time; in the last twenty years the situation has almost reversed: water quality better than 100 mg/l only 20% of the time, and worse than 150 mg/l 50% of the time. A relaxation of this standard will cause significant degradation in the spring as well, driving chloride concentrations to levels that are unacceptable for drinking water protection.

The existing Collinsville X2 relaxation in the 1995 Plan was developed as part of the December 15, 1994 Bay-Delta Accord. The relaxation was designed to provide a balance between water supply and fishery protection in the most severe dry years, and was linked to the entire fishery protection package in the Bay-Delta Accord. Any further relaxation of this standard will upset that delicate balance. Because of the dramatic effect such a relaxation would have on fisheries and on drinking water quality, CCWD strongly opposes any further relaxation.

If you or your staff have any questions regarding these comments, please contact me at (925) 688-8187.

Sincerely,



Richard A. Denton  
Water Resources Manager

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cc: Chester V. Bowling (USBR)  
Alf Brandt (DOI)  
Cathy Crothers (DWR)  
Ken Landau (CVRWQCB)  
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