



**CONTRA COSTA
WATER DISTRICT**

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September 16, 2005

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

Re: CCWD Comments on the August 31 Workshop on Flexing X2

Dear Ms. Irvin:

Contra Costa Water District (CCWD) appreciated the opportunity to participate in the State Water Resources Control Board's (SWRCB) August 31, 2005 workshop on "Consideration of Potential Amendments or Revisions to the Delta Outflow Objective of the Water Quality Control Plan for the San Francisco Bay / Sacramento-San Joaquin Delta Estuary." CCWD's position regarding potential "flexing" of the estuarine habitat (X2) objective is unchanged from that expressed in our August 16, 2005 comment letter (Denton to Irvin, Consideration of Potential Flexing of the Port Chicago X2 Objective). The purpose of this letter is to comment on the proposals made by the State Water Contractors and San Luis Delta-Mendota Water Authority at the August 31 workshop. The export contractors asked the SWRCB consider flexing other objectives in addition to the X2 Port Chicago objective.

CCWD requests that the SWRCB not consider flexing of the Rio Vista flow objective and the export/inflow (E/I) ratio because the adverse water quality and fisheries impacts of relaxing these objectives are potentially large and no analysis of these impacts has been provided to the SWRCB. None of the "sideboards" proposed by the export contractors for Rio Vista and the E/I ratio addressed protection of drinking water quality. CCWD also notes that the export contractors' proposal was outside of the workshop purpose given in the SWRCB's July 18, 2005 Notice of Public Workshop.

The SWRCB should not even consider the request until there is full analysis of the potential Delta water quality impacts that may result. If consideration were to be given to these concepts, the SWRCB would certainly need to seek input from other interested parties, such as CCWD, on the specific adverse impacts to water quality that may directly result from a decreased Rio Vista flow objective, or an increase in allowable E/I ratio.

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The Rio Vista flow objective, applicable September through December, has the same numerical flow requirements as the net Delta outflow objective. Flexing the Rio Vista flow objective downward (resulting in reduced flow) at times when the Rio Vista objective is governing would result in decreased Delta outflow and a corresponding degradation of Delta water quality.

Similarly, allowing an increase in the E/I ratio (increased exports and reduced Delta outflow) could degrade Delta water quality. For example, a figure distributed by the Department of Water Resources (DWR) operations group to CCWD and others on September 9, 2005 (Attachment A), shows the predicted increase in electrical conductivity (EC, a surrogate measurement for salinity) resulting from the current increase in exports by 500 cubic feet per second (cfs) for the Environmental Water Account. DWR's modeling suggests the increase in diversions by the State Water Project will cause an increase in salinity at Holland Cut, which is near CCWD's point of diversion at Rock Slough, of up to 30 $\mu\text{mhos/cm}$ EC (or about 9 mg/L chloride). The effects of export increases on Delta water quality will vary depending upon when exports are increased; however, this current example illustrates how increases in exports in the absence of increased inflow into the Delta can impact Delta water quality.

CCWD requests that the SWRCB not consider any flexing of Water Quality Control Plan objectives that would result in adverse water quality impacts on CCWD. If you or your staff have any questions regarding these comments, please contact 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

Attachment A: Simulated increase in salinity at Holland Cut as a result of 500 cfs of increased exports

cc: Ron Milligan (USBR)
Amy Aufdemberge (DOI)
Cathy Crothers (DWR)
Ken Landau (CVRWQCB)
Carl Nelson (BPNMJ)

Simulated Increase in Salinity at Holland Cut as a Result of 500 cfs of Increased Exports
(DWR modeling results, September 9, 2005)

