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Central Contra Costa Sanitary District

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Secretary of the District

June 24, 1998

Mr. Rick Breitenbach
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Dear Mr. Breitenbach:

CALFED BAY-DELTA PROGRAM DRAFT PROGRAMATIC EIS/EIR COMMENTS

The Central Contra Costa Sanitary District (CCCSD) appreciates the opportunity to submit comments on the CALFED Bay-Delta Program Draft EIS/EIR. CCCSD has the facilities and capability to produce and deliver recycled water as a supplement to the State's water supply. The CCCSD recycled water could replace fresh water demands currently supplied by Delta water diversions while providing drought protection for the local water customers. The following comments are submitted for your information and consideration to encourage the development of recycled water supplies throughout the State.

1. The CCCSD Water Reclamation Plant has a total potential yield of about 30,000 acre feet per year for both industrial and landscape irrigation uses. This yield could conceivably be developed as early as 2005 based on current demands.
2. The CCCSD Water Reclamation Plant has a current treatment capacity of 25 mgd with primary sedimentation, activated sludge, UV disinfection, coagulation, filtration, and chlorination. The current type of reuse is landscape irrigation, light industrial, and CCCSD in-plant use. The total current annual use is 1,200 acre feet with next year's use expected to increase to 1,700 acre feet with the connection of additional irrigation customers. Further treatment may be required for recycled water to be used in industrial cooling towers and boilers, which would utilize the full 25 mgd CCCSD capacity.
3. Conflicts with existing water supply statutes are currently deferring CCCSD options to increase the State's water supply in the Delta. When there is a conflict based on current law or contract, CCCSD recommends that specific statutes or contracts be evaluated for possible revision to remove roadblocks to recycling.



Current Bureau of Reclamation contract language does not provide incentives to municipal water agencies for recycling water in the same manner as conservation programs. For example, water saved by recycling is not credited to the "base line" water demand. This policy increases the impact of drought reductions on water agencies who may be routinely recycling water on an annual basis.

4. Recycled water will lessen existing demand on in-stream sources of water. A significant portion of that saved in-stream water may then be transferred to other users. Recycled water usage has the advantage of being able to be metered. Thus, the amount of water saved through recycling and eligible for transfer out of the Delta can be readily quantified on an annual basis. Therefore, CCCSD recommends that fresh water saved by using recycled water be considered as a viable source of water for transfer.
5. CCCSD supports the EIS/EIR's approach of using an integrated solution to solve the complex problems facing the Bay-Delta system, which includes the Program element: "Water Use Efficiency." Reusing Delta water after it has been used and discharged to the sewers meets the goal of increasing water use efficiency. Recycled water is a high quality and reliable source of drought - proof water. Furthermore, reusing Delta water serves to increase the State's available water supply. By recycling highly treated wastewater, CCCSD would be able to increase the State's annual water supply by offsetting 30,000 acre feet of existing Delta water supplies currently used for industrial cooling tower, boiler feed, and landscape irrigation in Contra Costa County. Recycling by CCCSD would increase the availability of Delta water for environmental or other beneficial uses throughout the State. The immediate barrier to this new water supply is the fact that the local water purveyor would suffer revenue loss from the lack of sales of Delta water. The State and Federal governments could mitigate this economic hardship on local water purveyors by facilitating water marketing and transfers of the fresh water conserved. The State and Federal governments should therefore be willing to facilitate water transfers on behalf of the local water purveyors who would otherwise suffer economic hardship.
6. Recycled water should be included as a "soft solution" approach to solving the State's water supply problem on a par with conservation programs. Recycled water should be included as a component of best management practices (BMP's) to be encouraged by water supply agencies.

Rick Breitenbach

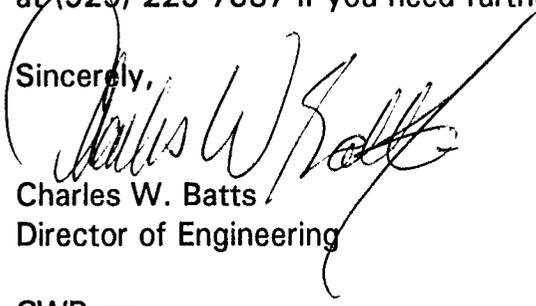
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As a supplier of a potentially significant amount of competitively priced recycled water, CCCSD recognizes the need for a well-managed State water marketing and transfer system to assist local potable water agencies to overcome lost revenue due to recycling. CCCSD believes the State could supplement the State's water supply through administrative efforts in managing an efficient water marketing and transfer process.

Thank you for the opportunity to comment on the EIS/EIR. Please contact Mr. James Coe at (925) 229-7387 if you need further information.

Sincerely,



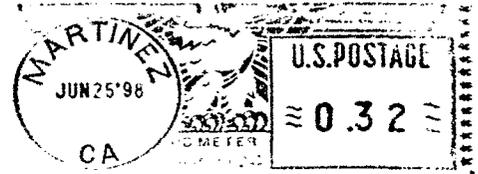
Charles W. Batts
Director of Engineering

CWB:sm



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