

Assistant Secretary Beneke and Secretary Nichols
CCWD interests regarding the CALFED Bay-Delta Program
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Attachment B

CCWD's Must-Have List for the Record of Decision

CCWD has developed the following list of items that protect the interests of the Contra Costa Water District and other Delta water users, and must be addressed by the time of the Record of Decision (ROD), if CALFED is to succeed in meeting its goals and objectives. CALFED must:

1. Establish **intermediate water quality milestones** to guide and track CALFED's progress towards continuous water quality improvement and meeting its long-term water quality goals¹;
2. Commit, by the time of the ROD, to implement **water quality improvement projects** in the Delta, including significantly reducing the water quality impacts of Veale Tract and Byron Tract drainage in the vicinity of CCWD's drinking water intakes;
3. Ensure coordinated agency actions and immediate implementation of a strategy to **reduce mass emissions from wastewater treatment plant discharges** and other sources of drinking water contamination. This will require financial and policy level support for the development of a Drinking Water Protection Policy by the Central Valley Regional Water Quality Control Board, working with the State Water Resources Control Board, Department of Health Services, San Francisco Bay Regional Water Quality Control Board, and U.S. Environmental Protection Agency. This policy will include the development of water quality objectives for total organic carbon (TOC), total dissolved solids (TDS), bromide and pathogens, and the development of a management plan to meet the objectives. Development of this policy is essential for achieving drinking water quality improvement. Establishing water quality objectives is key to the future development of total maximum daily loads (TMDLs) for drinking water parameters of concern.
4. Develop and begin implementing actions to **reduce the total organic carbon load²** to the Delta;
5. Ensure **salinity reduction in the Delta** through operational changes, modified in-Delta conveyance, and San Joaquin salinity management;
6. **Reject any proposals to store water on Delta islands** that would result in any increases in the load of total organic carbon and salinity discharged into the Delta. Of particular

¹ 50 µg/l bromide and 3 mg/L total organic carbon or an equivalent level of public health protection through a cost-effective combination of conveyance changes, alternative source water, source control, and treatment.

² Total organic carbon and bromide are disinfection by-product precursors

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concern to CCWD is storage of water over peat soils which would result in significant increases in organic carbon in the stored water and significantly impact urban drinking water providers like CCWD who use Delta water;

7. Assure that environmental water use is managed efficiently based on sound scientific justification. CCWD is particularly concerned that CALFED is considering using as a measure of ecosystem improvement, a flow parameter, QWEST³, that has been shown and acknowledged to have absolutely no significant correlation with fisheries survival in the Delta. QWEST is likely to be used by some stakeholders to justify a highly contentious CALFED isolated facility even though there is no scientific basis for using QWEST as a measure of ecosystem performance;
8. Assure that environmental actions maximize benefits for fish, water quality and water supply reliability. CCWD supports the goal of the Ecosystem Restoration Program and the Ecosystem Water Account. However, some proposed actions, designed to benefit fisheries and/or improve water supply reliability could cause significant degradation of water quality in the Delta, particularly at the District's intakes and in the south Delta;
9. Define clear, specific goals for species conservation and/or actions needed to promote recovery of listed and sensitive species.
10. Make a Programmatic Section 404 finding that surface storage is required as part of the CALFED Program, including a finding of the need for additional off-stream surface storage for water quality and water transfers. CCWD believes that new storage can provide net benefits to water quality, water supply reliability, and to the Delta ecosystem;
11. Develop a comprehensive assurance package that fully addresses existing assurances developed to protect in-Delta water users from the effects of the State Water Project, such as the Delta Protection Act of 1959. No new assurance package for new CALFED facilities and actions will be acceptable to in-Delta and in-Basin water users like CCWD unless commitments for existing facilities are honored.
12. Assure that water supply needs of Delta and area of origin water users will be met (consistent with the 1959 Delta Protection Act).
13. Define a clear process for the decisions on the need for an isolated facility;

³ QWEST is an estimate of the tidally-averaged flow out of the Western Delta via the lower San Joaquin River and Three Mile Slough and is considered to represent the effect of net reversals in flow in the lower San Joaquin River, i.e., flow into rather than out of the Delta.

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14. Provide further experimental analysis and modeling of the water quality benefits of the proposed Hood Diversion Test Facility before such a pilot facility is considered for construction. CCWD questions the need and efficacy of the proposed Hood Diversion Test Facility and questions the accuracy of the computer models being used to justify the need for such a facility on water quality grounds;
15. Account for and credit existing ecosystem restoration programs, e.g., Category III and CVPIA Restoration Fund⁴, when considering CALFED's ecosystem program and user-based funding sources; and
16. Extend the Bay-Delta Accord and its protections through Stage 1.

⁴ CCWD currently pays more than \$1.3 million annually into the CVPIA Restoration Fund