

From: [Anna Battagello](#)
To: [Anna Battagello](#)
Subject: FW: CCWD's USBR Water Management Plan Final Adopted June 2017 - REJECT the plan it is not SMART
Date: Monday, May 21, 2018 2:31:40 PM
Attachments: [CCWD USBR WMP Final wAppdx Res 17-013.pdf](#)

From: Leland Frayseth
Sent: Monday, May 21, 2018 4:57 AM
Subject: CCWD's USBR Water Management Plan Final Adopted June 2017 - REJECT the plan it is not SMART

Dear California Water Commission (CWC) Commissioners Quintero, Baker, Ball, Byrne, Curtin, Del Bosque, Keig, Herrera, Orth, United States Bureau of Reclamation (USBR) Woodley and Stemen, staff and the public,

My name is Leland Frayseth, I am a 30+ year Contra Costa Water District (CCWD) customer, I am interested in water, water cost and water quality issues. I oppose the Los Vaqueros 275,000 AF expansion. Please reject CCWD's Los Vaqueros 275,000 AF (acre-feet) expansion application because they do not have a plan and what they have is not SMART (Specific, Measurable, Achievable, Realistic and Timely).

In CCWD's Urban Water Management Plan they submitted to Department of Water Resources in 2016 they wrote "Since 1992, the District has spent over \$1.3 billion on capital improvements, including \$450 million on the Los Vaqueros Project ...". There is no mention in that plan of the additional \$795 million they are currently asking us taxpayers and rate payers for to expand Los Vaqueros to 275,000 AF. In CCWD's Water Management Plan they submitted to the United States Bureau of Reclamation adopted by their Board June 2017 and just published in the Federal Register last week there is no mention of the additional \$795 million they now seek to expand Los Vaqueros to 275,000 AF. This Copernicus satellite photo of Los Vaqueros dam illustrates what us taxpayers and ratepayers get without a plan, a reservoir that does not meet it's water quality and reliability objectives, has a stuck gate 5. recurring mudslides on the dam face, higher salinity than Delta water (probably due to evaporation) and an algal bloom.

Error! Filename not specified.

The following are my specific public review comments I am hereby submitting to USBR on CCWD's Water Management Plan Final Adopted June 2017.

1. I asked to review the plan 15 months ago the notification just appeared in the Federal Register last week this is not timely.
2. My CCWD Director John Burgh said at the 10 Jan 2018 Operations and Engineering meeting that I (Leland Frayseth) was the only one who reads the Water Management Plan, it is unacceptable to me the Director's voted for this plan without reading it. The plan needs to be shortened so the Directors read the plan. If Reclamation is providing a template for these plans their leadership needs to get their propeller heads together and come up with a concise template.
3. The plan's cover page has CCWD's 75 year anniversary logo, according to their web site last week they are now celebrating their 82 anniversary.
4. Section 1, A, 3 Table 1-3 page 10 reads 54,806 AF received calendar year 2015 however USBR table at this link reads 71,616 AF delivered to Contra Costa canal. Please explain the discrepancy. https://www.usbr.gov/mp/cvo/vungvari/table_21_2015.pdf It is unacceptable 2015 is referred to as the current year for a plan I am now reviewing May 2018.
5. Section 1 B, 9 Proposed changes and additions no mention of Los Vaqueros 275,000 AF

expansion, no mention of CCWD's agreement with DWR on WaterFix.

6. Page i, ii page numbers in 300 and 400 range are typos and should reference pages in 30 and 40 range.
7. Section 2 D, 1 Potable water quality there is no mention of CCWD's agreement with California Parks on spraying and post spraying testing procedures for application RoundUp-glyphosate (Proposition 65 warning known by the State of California to cause cancer) to control aquatic vegetation at CCWD's Rock Slough intake.

When will the revised Water Management Plan addressing my comments be available for my review?

Thank you, Leland Frayseth

30+ year CCWD customer, ratepayer, concerned citizen

WATER MANAGEMENT PLAN

REPORT TO THE UNITED STATES BUREAU OF RECLAMATION ON CCWD's WATER CONSERVATION PROGRAM AND ACTIVITIES

FINAL

**Adopted
June 2017**



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Water Management Plan

REPORT TO THE UNITED STATES BUREAU OF RECLAMATION ON CONTRA COSTA WATER DISTRICT'S WATER CONSERVATION PROGRAM AND ACTIVITIES

FINAL

**Adopted
June 2017**

Board of Directors

Lisa M. Borba, President
Connstance Holdaway, Vice President
Ernesto A. Avila
Bette Boatmun
John A. Burgh

General Manager
Jerry Brown

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Executive Summary

This Water Management Plan (Plan) was prepared according to the United States Bureau of Reclamation's Mid-Pacific Region 2014 Standard Criteria. The Plan must be updated every five years and submitted to the U.S. Bureau of Reclamation (Reclamation) in accordance with Contra Costa Water District's (CCWD or District) Long-Term Renewal Contract for water service from the Central Valley Project (CVP). Information on CCWD's water supply sources and water use is provided in this Plan. This Plan also provides information on CCWD's customer base, water system facilities, and the status of CCWD's water conservation programs.

Background

The Reclamation Reform Act of 1982 expanded Reclamation's responsibilities from building and managing waterworks to also ensuring federal water is put to reasonable and beneficial use. Section 210 of the Reclamation Reform Act (RRA) requires CVP contractors to prepare and submit Water Management Plans with definite goals, appropriate water conservation measures, and timetables every five years. The Central Valley Project Improvement Act of 1992 (CVPIA) mandated Reclamation develop criteria for assessing the adequacy of these plans. The CVPIA further requires contractors to have adequate plans on file in order to obtain certain benefits or at such time as they renew their contracts.

Service Area Description

The Contra Costa County Water District was approved by the voters in 1936 as the legal entity to contract, purchase, and distribute water provided by Reclamation through the Contra Costa Canal. In 1981, "County" was dropped from the name, leaving Contra Costa Water District. The 48-mile Contra Costa Canal conveys water from the Sacramento-San Joaquin Delta (Delta), through Rock Slough, Old River and Middle River, to eastern and central Contra Costa County (County). CCWD's service area encompasses most of central and northeastern Contra Costa County, a total area of more than 140,000 acres (including the Los Vaqueros watershed area of approximately 19,100 acres). Water is provided to a combination of municipal, residential, commercial, industrial, landscape irrigation, and agricultural customers. Major municipal customers include the Diablo Water District (Oakley) and the Cities of Antioch, Pittsburg, Golden State Water Company (Bay Point) and Martinez, each of which distribute water to their retail customers. Treated water is distributed to individual customers living in the following communities in the Treated Water Service Area: Clayton, Clyde, Concord, Pacheco, Port Costa, and parts of Martinez, Pleasant Hill, and Walnut Creek. In addition, CCWD delivers water to the Diablo Water District, City of Brentwood, Golden State Water Company (Bay Point) and the City of Antioch. Antioch, Pittsburg and Martinez operate their own water treatment plants.

For the first 25 years of its existence, CCWD's main responsibility was the purchase and distribution of untreated water through the Contra Costa Canal. The cities and other water utilities within CCWD were responsible for treating water used by their customers. However, in the late 1950s, many citizens and public officials became concerned about the quality and cost of water in the central County area. To solve this problem, CCWD purchased the California Water Service

Company's Concord-area treatment, pumping, storage, and distribution facilities. In 1968, CCWD replaced the old treatment facilities with the construction of its own Ralph D. Bollman Water Treatment Plant in Concord. In 1992, CCWD completed the Randall-Bold Water Treatment Plant in Oakley that is jointly owned with the Diablo Water District (DWD). The Randall-Bold plant provides treated water to DWD, and by contract, to the Cities of Brentwood and Antioch and the Golden State Water Company (Bay Point). Additionally, the Multi-Purpose Pipeline, constructed in 2003, allows CCWD to serve new customers in the central County Treated Water Service Area (TWSA) from the Randall-Bold plant. Combined, the Bollman and Randall-Bold water treatment plants provide treated water to approximately 200,000 people in the central County area. CCWD's service area also includes a large industrial base that includes oil refineries, steel mills, and chemical manufacturing facilities. Large industrial water use accounts for approximately one-third of total water use within CCWD.

In 2004, CCWD entered into an agreement to treat water for a major new customer, the City of Brentwood. Under the agreement, CCWD constructed and is operating a 16.5 million gallons per day (mgd) treatment plant adjacent to the Randall-Bold Water Treatment Plant.

Contra Costa Water District Mission and Goals

CCWD's mission is to strategically provide a reliable supply of high quality water at the lowest cost possible, in an environmentally responsible manner. To fulfill that mission, CCWD's Board of Directors (Board) established the following CCWD goals:

1. Ensure that the District delivers high quality and reliable water supplies for current and future needs.
2. Provide excellent customer service and high levels of customer satisfaction.
3. Plan, design, and construct high quality facilities consistent with District needs and industry standards.
4. Effectively manage the District's financial resources in conformance with Board policies.
5. Ensure that all District activities surpass all applicable laws and regulations.
6. Operate, maintain, and protect District facilities in a safe and cost-effective manner.
7. Provide leadership in water affairs.
8. Actively enhance effective community relations and public information.
9. Create and maintain a work environment that fosters teamwork and individual excellence.
10. Manage and maintain Reclamation and District natural and recreation resources, and protect public safety and water quality.

Water Supply Sources

CCWD is almost entirely dependent on the Sacramento-San Joaquin Delta for its water supply; with Reclamation's CVP as the primary water source. CVP water includes unregulated and regulated flows from storage releases from Shasta, Folsom, and Clair Engle reservoirs into the Sacramento River. Other sources include the San Joaquin River, Mallard Slough (on the San Joaquin River), recycled water, a minor amount of local well water, and water transfers.

Central Valley Project Supply

CCWD's long-term CVP contract was renewed in May 2005 and has a term of 40 years (contract No. 175r-3401a-LTR1). The contract with Reclamation provides for a maximum delivery of 195,000 acre-feet per year (af/yr) from the CVP, with a reduction in deliveries during water shortages including regulatory restrictions and drought. The Municipal and Industrial (M&I) Water Shortage Policy defines the reliability of CCWD's CVP supply and was developed by Reclamation to establish CVP water supply levels that would sustain urban areas during severe or continuing droughts and provide for minimum health and safety. The M&I Water Shortage Policy provides for a minimum allocation of 75 percent of adjusted historical use until irrigation allocations fall below 25 percent.

Los Vaqueros Water Rights

CCWD obtained additional water rights for surplus Delta flows as part of the Los Vaqueros Project. Up to 95,980 acre-feet may be diverted for storage in Los Vaqueros Reservoir from November 1 of each year to June 30 of the succeeding year under Water Rights Permit No. 20749. The Los Vaqueros Water Rights supply can be used in lieu of the CVP supply. When Los Vaqueros Water Rights water is used, CVP supplies are reduced by an equivalent amount. Combined deliveries of Los Vaqueros Water Rights water and CVP water are limited to 195,000 af/yr. Little or no Los Vaqueros Water Rights water is available for diversion to storage in dry years.

Construction of CCWD's Los Vaqueros Expansion (LVE) Project was completed in 2012. The LVE Project expanded the existing Los Vaqueros Reservoir capacity from 100,000 acre-feet to 160,000 acre-feet, providing additional water supply reliability and water quality benefits.

Mallard Slough Supply

CCWD has additional water rights at Mallard Slough for a maximum diversion of Delta water of up to 26,780 af/yr. Diversions from Mallard Slough are unreliable due to frequently poor water quality in the San Joaquin River at this point of diversion. Water quality conditions have restricted diversions from Mallard Slough to approximately 3,100 af/yr (on average) with no availability in dry years. When Mallard Slough supplies are used, CVP diversions are reduced by an equivalent amount.

East Contra Costa Irrigation District

CCWD entered into an agreement with the East Contra Costa Irrigation District (ECCID) in 2000 to purchase surplus irrigation water for M&I purposes in ECCID's service area. Only a portion of ECCID is within the existing CCWD service area (estimated current demand of 6,000 af/yr). The current ECCID agreement allows CCWD to purchase up to 8,200 af/yr for service in the areas common to both districts. The agreement also includes an option for up to 4,000 af/yr of groundwater (by exchange) when the CVP is in a shortage situation. The groundwater exchange water was utilized during the 2007-2009 drought, and the 2013-2015 drought. This exchange

water can be used anywhere within CCWD's service area. Water delivered by CCWD to the City of Brentwood is purchased by the City from ECCID under a separate contract.

CCWD Water Conservation Program

CCWD has actively and consistently implemented a variety of effective water conservation programs since 1988. CCWD is a signatory to the Memorandum of Understanding Regarding Urban Water Conservation in California (MOU) developed by the California Urban Water Conservation Council (CUWCC). The District implements Best Management Practices (BMPs), as prescribed in the MOU and as required in the Standard Criteria for Evaluating Water Management Plans.

CCWD's Water Conservation Program fulfills the mission of the District by reducing long-term water demand in an environmentally responsible and cost effective manner. The long-term water savings goal for the Conservation Program is to reduce demand by five percent of what it would be in 2050 without District-implemented conservation measures. This equates to approximately 10,000 acre-feet in the year 2050. This amount is in addition to expected conservation savings from natural fixture replacement and other non-District conservation activities. CCWD is on track to meet this goal.

In November of 2009 the historic Senate Bill (SB) X7-7 (20% by 2020) was enacted to increase water use efficiency. The legislation sets an overall requirement of reducing per capita urban water use 20% by December 31, 2020. The reduction requirements apply to CCWD's wholesale customers as well. Specific water use targets to meet the SBX7-7 requirements for CCWD were evaluated in CCWD's 2010 and 2015 Urban Water Management Plans.

A detailed discussion of current water conservation activities and their status is provided in Section 4. The elements of CCWD's current conservation program include both Foundational and Programmatic BMPs.

Report Format

The 2014 Standard Criteria (Appendix A) provide a recommended format for Water Management Plans. Calendar year 2015 was selected as the reference reporting year for submittal of this Plan. The recommended Water Management Plan consists of four sections. Sections 1 and 2 include descriptive information about CCWD including land use, customer characteristics, and descriptions of the physical system and water resources. Sections 3 and 4 present the agricultural (not applicable to CCWD) and Municipal & Industrial (M&I) BMPs, including the California Urban Water Best Management Practices described in the MOU signed by CCWD in September 1991.

Appendices to this plan provide detailed information as specified in the Reclamation Guidebook. The CVPIA Criteria is included as Appendix A, and a District Facilities Map can be found in Appendix B. Appendices C contains relevant sections of CCWD's Code of Regulations regarding water supply and rates. Appendix E contains the 2015 Drought Management Plan and the Water Shortage Contingency Plan. Additional appendices include the Reclamation approval letter

(Appendix D), the Board Resolution prohibiting water waste (Appendix F), the 2015 CCWD Annual Water Quality Report (Appendix G), the annual CCWD BMP reports (Appendix H), examples of Public Outreach programs (Appendix I), and the Board Resolution adopting the Water Management Plan (Appendix J).