



**CONTRA COSTA  
WATER DISTRICT**

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March 17, 2004

Jeremy Arrich  
Department of Water Resources  
Division of Planning and Local Assistance  
P.O. Box 942836  
Sacramento, CA 94236-0001

**Subject: Contra Costa Water District comments on the January 2004 Draft In-Delta Storage Program State Feasibility Study**

Dear Mr. Arrich:

Contra Costa Water District (CCWD) appreciates this opportunity to comment on the January 2004 Draft In-Delta Storage Program State Feasibility Study (Study). CCWD also appreciates the open and collaborative manner in which the Department of Water Resources has shared its modeling for this project.

As a supplier of drinking water drawn from the Delta and delivered to its 450,000 customers, CCWD's primary concern is protection of Delta water quality. To ensure that operation of the In-Delta Storage (IDS) project does not degrade Delta water, CCWD entered into a Protest Dismissal Agreement (PDA) with Delta Wetlands Properties for their Delta Wetlands Project. Both this PDA and the PDA between the California Urban Water Agencies (CUWA) and Delta Wetlands Properties specify operating conditions for the project and are binding upon any successor project to Delta Wetlands. So long as IDS is operated in compliance with the PDAs, Delta water quality will be protected and CCWD's interests would be satisfied.

However, IDS operations as modeled for the Study show significant deviations from the requirements of both PDAs, including significant exceedences of the limits on salt and organic carbon concentrations at urban drinking water intakes. Thus the modeled operations and results are not representative of the agreed-upon actual project operations and performance, and conclusions about project yield and benefits are not supported by the Study. Before the Study is finalized, proposed project operations must be revised and re-modeled such that compliance with the PDAs is demonstrated. Conclusions about project yield and benefits must be based upon the results of modeled operations that meet the terms and conditions of both PDAs.

Jeremy Arrich

CCWD comments on the January 2004 Draft In-Delta Storage Program State Feasibility Study

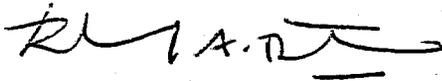
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CCWD has expressed this concern in previous letters, most recently in Greg Gartrell's October 27, 2003 letter to Michael Spear and in our June 28, 2002 comments on the May 2002 In-Delta Storage Program Draft Summary Report. Further, CCWD participated in drafting CUWA's March 2004 comment letter on the current Study, and concurs with CUWA's detailed technical comments on issues concerning compliance with the PDAs.

If you have any questions, please call me at (925) 688-8187 or call Dr. Leah Orloff at (925) 688-8083.

Sincerely,



Richard A. Denton  
Water Resources Manager

RAD/LSO:wec