



Central Contra Costa Sanitary District

Protecting public health and the environment

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Sent via e-mail to: DeltaPlanComment@deltacouncil.ca.gov

June 24, 2011

Mr. Phil Isenberg, Chairman
Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, CA 95814

Dear Chairman Isenberg:

COMMENTS ON DRAFT VERSION NO. 4 OF THE DELTA PLAN

The Central Contra Costa Sanitary District (CCCSD) appreciates the opportunity to review and comment on the draft version no. 4 of the Delta Plan. As background, CCCSD collects and treats approximately 45 million gallons per day of wastewater from 460,000 customers in the central part of Contra Costa County. The CCCSD service area overlaps three water districts: Contra Costa Water District, East Bay Municipal Utility District, and Dublin San Ramon Services District. All three water agencies obtain water from either the Delta or a river upstream of the Delta.

Draft version no. 4 of the Delta Plan emphasizes the provisions of the 2009 water legislation related to the two co-equal goals of protecting, restoring and enhancing the Delta ecosystem and providing a more reliable water supply for all of California. Toward this end, Chapter 4 of the draft Delta Plan recognizes that additional local and regional water conservation and water supply development, including water recycling, is needed to reduce reliance on the Delta and achieve the co-equal goals.

CCCSD urges the Delta Stewardship Council (DSC) to strongly promote water recycling as a way to reduce reliance on the Delta and to reduce water diversions and exports from the Delta. As noted in Chapter 4 of the Plan (page 60), the California Department of Water Resources has identified water recycling as a major strategy to increase the state's water supply by approximately 2 million acre-feet per year. The water supply potential of water recycling is second only to urban water use efficiency.

Water recycling would be implemented as regional or local projects near the points of use, thereby adding to the reliability of local water supplies. CCCSD believes that local and regional water recycling projects would be less controversial than large-scale water storage and conveyance projects, could be implemented sooner, and therefore, would result in environmental or water supply benefits being realized sooner. Also, water

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recycling would make water supplies more reliable because there is less reliance on Delta conveyances that could be interrupted by levee failures.

CCCSD supports the proposed policies and recommendations listed in the draft Delta Plan to advance local and regional water conservation and water supply development, specifically Policies WR P1, WR P2, and WR P3, and Recommendations WR R1, WR R2, and WR R3 (Chapter 4, pages 62-65).

During the 1990s and early 2000s, the California Water Code and Government Code were amended to include many statutes that made findings, set goals, and established policies and planning procedures to increase the use of recycled water throughout the state. For example, Water Code, Section 13550, states that “the Legislature hereby finds and declares that the use of domestic potable water for non-potable uses, including, but not limited to, cemeteries, golf courses, parks, highways, landscaped areas, and industrial and irrigation uses, is a waste or an unreasonable use of water within the meaning of Section 2 of Article X of the California Constitution if recycled water is available...”

More recently, the State Water Resources Control Board (SWRCB) adopted a Recycled Water Policy in 2009. This policy mandates an increase in the use of recycled water by 200,000 acre-feet per year (AFY) statewide by 2020 and by an additional 300,000 AFY statewide by 2030. As SWRCB is charged with establishing Delta flow criteria, which will likely decrease Delta diversions and exports, water recycling will be a critical element in managing California’s water supplies. Implementation of the 2009 policy will achieve greater water recycling, which will result in sustainable local water supplies and, in turn, will mitigate Delta diversions. The DSC should consider adding a reference to the SWRCB Recycled Water Policy in either the Preamble or elsewhere in Chapter 4 of the Delta Plan.

Since 1995, CCCSD has had a water recycling program that provides 400 to 600 acre-feet per year of recycled water for landscape irrigation and certain commercial uses. During 2010, CCCSD supplied approximately 480 acre-feet of recycled water to irrigation customers who had been previously using potable water provided by the Contra Costa Water District.

CCCSD is actively pursuing projects to increase recycled water use in our service area. A project to extend recycled water service to the City of Concord has been designed, and state and federal funds are being sought for construction. More significantly for the Delta, CCCSD has the potential to recycle an additional 22,500 acre-feet per year to two nearby oil refineries. Recycled water would replace Delta water for use in cooling towers and boiler feedwater at the refineries. This project would play a significant role in reducing diversions from the Delta and developing a sustainable local water supply for this important industrial sector of Contra Costa County.

On a regional scale, water and wastewater agencies in the San Francisco Bay Area provided approximately 35,000 acre-feet of recycled water in 2010. However, this amounts to only 3% of the regional water supply. More than 500,000 acre-feet of treated wastewater that could have been recycled was discharged to San Francisco Bay or the Pacific Ocean. There are identified projects that would increase recycled water usage to more than 100,000 acre-feet annually, including the CCCSD refinery recycled water project described previously. So unfortunately, despite the past legislative and regulatory efforts, progress to expand the use of recycled water has been slow.

It is our hope that the leadership of the DSC will be influential in promoting the implementation of the projects described above and others in order to further reduce Delta water diversions. Toward this end, CCCSD encourages the DSC to find regulatory and financial ways to compel local water agencies, especially those that divert or export Delta water, to implement recycled water projects in accordance with the time frames mandated by the SWRCB Recycled Water Policy.

Finally, the draft Delta Plan also calls for improved reporting and transparency on water use and management in California (Chapter 4, page 73). CCCSD recommends that DSC call for better monitoring and reporting of recycled water use in order to better evaluate how the increased use of water recycling may contribute to the reduction of Delta water diversions and exports.

Thank you for the opportunity to comment on the draft Delta Plan (version no. 4). If you have any questions or need additional information, please contact me at 925-229-7336.

Sincerely,



Curtis W. Swanson
Environmental Services Division Manager

CWS:nap

cc: M. Davis, DSC
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