



CITY OF MANTECA

PUBLIC WORKS DEPARTMENT

April 21, 2014

Via Electronic Mail Only

Ms. Betty Yee
Senior Water Resource Control Engineer
Regional Water Quality Control Board,
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670
betty.yee@waterboards.ca.gov

RE: Comments on Basin Plan Amendments to Add a Variance Policy, Salinity Variance Program, and Salinity Exception Program

Dear Ms. Yee:

The City of Manteca (City) appreciates the opportunity to submit comments on the amendments to the *Water Quality Control Plan for the Sacramento River and San Joaquin River Basins* and the *Water Quality Control Plan for the Tulare Lake Basin* (Basin Plans) to add policies for *Variances from Surface Water Quality Standards for Point Source Dischargers* (Variance Policy), a *Variance Program for Salinity* (Salinity Variance Program), and an *Exception from Implementation of Water Quality Objectives for Salinity* (Salinity Exception Program).

The City owns and operates the Manteca Wastewater Quality Control Facility (WQCF), which provides wastewater treatment services to over 100,000 people in Manteca and the neighboring communities. The City would like to express our support for the amendments to the Basin Plans and to encourage the Central Valley Regional Water Quality Control Board (Regional Board) to adopt the Variance Policy, the Salinity Variance Program, and the Salinity Exception Program.

With respect to the Salinity Variance Program and Salinity Exception Program, the City has been active participants in the Central Valley Salinity Alternative for Long-Term Sustainability (CV-SALTS), the Regional Board's planning process for salinity and nutrient management and regulation. While CV-SALTS continues to develop a long-term plan that addresses salinity comprehensively, in the interim period, the City is concerned that the WQCF would have to comply with permit requirements based on the existing water quality objectives for salinity.

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The Manteca WQCF discharges high-quality, tertiary-treated effluent to the San Joaquin River in the South Delta region. Prior to mid-2005, the City used groundwater as its sole potable water source. Beginning in July and August 2005, the City began substituting a portion of its potable water supply from groundwater to surface water from the South San Joaquin Irrigation District's South County Surface Water Supply Project. Subsequently, EC levels in the WQCF's effluent decreased significantly. In fact, in recent years we have observed a 25% improvement in EC levels over those seen in 2004-2005.¹ However, despite these significant improvements, the WQCF cannot comply with the current summertime EC water quality objective of 700 µmhos/cm. The WQCF currently averages 763 µmhos/cm during the summer months.²

In addition, analysis has shown that the WQCF's current flows have an insignificant impact on salinity levels in the downstream receiving waters, and further improvements in effluent salinity would have no measurable environmental benefit. Specifically, the Technical Supporting Document for the Variance Policy³ shows that the WQCF's current effluent EC levels result in receiving water EC levels of 431 µmhos/cm. And, if the WQCF were to lower its effluent EC levels by 63 µmhos/cm to comply with the 700 µmhos/cm objective, the receiving water EC level would drop to an estimated 430 µmhos/cm, an improvement of 1 µmhos/cm. This insignificant improvement in receiving water quality would not justify the treatment facilities needed to lower EC levels nor the financial burden such facilities would place on our community. However, using the new Salinity Variance Policy and allowing the WQCF to discharge at current water quality levels is a reasonable regulatory approach that would not negatively impact the quality of the receiving water.

Furthermore, the water quality objectives upon which the 700 µmhos/cm summertime effluent limits are based are likely to be revised as a result of CV-SALTS or the State Water Resources Control Board's review of the salinity standards in the Bay-Delta Plan. We support the Salinity Variance Program and the Salinity Exception Program because it would provide the Regional Board with a necessary regulatory tool to use in the interim where current objectives may be made irrelevant by other regulatory and planning processes under development.

The City has recently applied for a renewal of its NPDES permit, and we are hopeful that the adoption of the Variance Policy will assist the Regional Water Board in issuing a reasonable permit, one that will be protective of beneficial uses without imposing unnecessary economic hardship on our community. Accordingly, the City encourages

¹ *Cover Letter for Report of Waste Discharge for Renewal of NPDES Permit No. CA0081558*. City of Manteca. April 2014.

² *Memorandum regarding Technical Evaluation of a Variance Policy and Interim Salinity Program for the Central Valley Region*. Larry Walker Associates. December 2012.

³ *Ibid.*

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the Regional Board to adopt the amendments to the Basin Plans as they are set forth in the March 2014 Draft Staff Report.

We appreciate your consideration of these comments. If you have any questions or if we can be of further assistance, please contact me at (209) 456-8415 or pgovea@ci.manteca.ca.us.

Sincerely,



Phil Govea, P.E.

Deputy Director of Public Works – Engineering

cc (via email): Mark Houghton, Public Works Director
John Clymo, Deputy Director Public Works
Laurie Ramirez, Wastewater Systems Superintendent
Debbie Webster, CVCWA Executive Director
Alina Constantinescu, Larry Walker Associates
Tom Grovhoug, Larry Walker Associates
Tess Dunham, Somach, Simmons & Dunn