



CVCWA Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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MICHAEL RIDDELL – SECRETARY, CERES FRED BURNETT – TREASURER, CALAVERAS COUNTY WD

January 4, 2007

Ms. Gita Kapahi, Chief
SWRCB
Bay Delta/Special Projects Unit
1001 I Street, 14th Floor
Sacramento, California 95812-2000

SUBJECT: Consideration of the Southern Delta Water Quality Objectives for Salinity in the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary

Dear Ms. Kapahi:

With this letter, the Central Valley Clean Water Association (CVCWA) responds to the State Water Resources Control Board's (State Water Board) Notice of Public Workshop regarding consideration of Southern Delta Water Quality Objectives for Salinity. CVCWA is an association of fifty six local public agencies that provide wastewater collection, treatment and water recycling services throughout the Central Valley region, including the Delta. On behalf of our Delta members, we submit the following comments and information regarding the Southern Delta water quality objectives for salinity.

It is CVCWA's understanding that the South Delta salinity standards are based on the agricultural water quality guidelines contained in the United Nation's FAO Irrigation and Drainage Paper (1985). As the State Board is aware, the water quality guidelines in the UN report are intended to cover a wide range of conditions and are based on several key assumptions, including semi-arid to arid conditions with low rainfall. The paper clearly indicates that the guideline values contained in Table 1 are management tools rather than absolute values and that the guidelines must be interpreted as they relate to specific field conditions. The guideline values contained in Table 1 were not intended by the UN to be used as water quality criteria, and additional analyses and evaluation are required before the values can be transformed into enforceable water quality standards

As the State Water Board opined in its order regarding the petition filed by the City of Woodland, "[t]he UN Report makes it clear that site-specific considerations are important in assessing irrigation water suitability." (Order WQO 2004-0010, page 7.) In light of the express caveats contained in the UN Report, the State Board rescinded the electrical conductivity effluent limitation contained in the City's NPDES permit and instead required the City to conduct a study "to evaluate soil chemistry, climate, rain and flood-induced leaching and background water quality for the affected area and their impact on irrigation salinity

requirements. Based on a site-specific assessment of these factors, the study must propose an EC level that fully protects Tule Canal's AGR use." (Order, pages 7-8.) In keeping with the State Water Board's *Woodland* decision, CVCWA recommends that the State Water Board undertake the same type of study that was required of the City of Woodland to determine the appropriate water quality objectives for salinity in the South Delta.

In addition, the State Water Board must consider the factors as set forth in California Water Code section 13241 when establishing South Delta water quality objectives. Pursuant to Water Code section 13241, the State Board must consider past, present and probable future beneficial uses of water; environmental characteristics of the hydrographic unit under consideration, including the quality of water available thereto; water quality conditions that could reasonably be achieved through the coordinated control of all factors which affect water quality in the area; economic considerations; the need for developing housing within the region; and, the need to develop and use recycled water. (CA Water Code §13241.) The consideration of these factors is especially relevant regarding the impact that South Delta water quality objectives may have on municipal wastewater dischargers, as these impacts were not evaluated when the Delta objectives were originally established. (See *In the Matter of the Petition of the City of Manteca*, Order WQO 2005-005 at p. 10.)

In particular, the State Water Board must consider the economic consequences associated with requiring municipal dischargers to meet the objectives as effluent limitations in light of the impact actually caused by the municipal discharge. Compliance with the existing salinity standards would require treating municipal wastewater using reverse osmosis. As the State Water Board noted in the *Manteca* decision, "[c]onstruction and operation of reverse osmosis facilities to treat discharges from the City's WQCF, prior to implementation of other measures to reduce the salt load in the southern Delta, would not be a reasonable approach." (Order WQO 2005-0005, page 14.) In reaching this conclusion, the State Water Board cited its decision to conduct a review of South Delta salinity standards. Thus, as part of this review, the State Board must consider the economic impact that application of alternative South Delta salinity standards will have on municipal wastewater dischargers, as well as other sources.

CVCWA recommends that the State Water Board undertake a study that considers soil, climate, rainfall, flood induced leaching and background water quality to determine the appropriate objectives for salinity to protect the AGR beneficial uses in the affected area in the South Delta. Furthermore, the State Water Board must consider the economic impact that the water quality objectives may have on municipal dischargers in the affected area. South Delta water quality objectives are currently being used to establish water quality based effluent limits for municipal dischargers even though the impact to municipal dischargers has not previously been considered as required by law.

CVCWA appreciates the opportunity to comment and looks forward to continued participation in the State Water Board's Bay-Delta process. If you have any questions regarding our comments, please do not hesitate to contact me at (530) 886-4911.

Sincerely,



Warren Tellefson
Executive Officer

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