



CITY OF STOCKTON

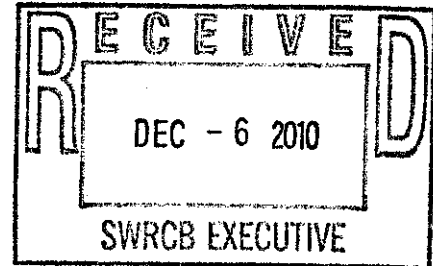
DEPARTMENT OF MUNICIPAL UTILITIES

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DRAFT TECHNICAL REPORT ON THE SCIENTIFIC BASIS FOR ALTERNATIVE SAN JOAQUIN RIVER FLOW AND SOUTHERN DELTA SALINITY OBJECTIVES

This letter provides the City of Stockton's comments on the Draft Technical Report on the Scientific Basis for Alternative San Joaquin River Flow and Southern Delta Salinity Objectives (Draft Report). Our comments below are focused on the Southern Delta Salinity Objectives, Chapter 4 of the Draft Report.

As an opening comment, we agree with the language of the Draft Report that emphasizes a significant inconsistency in the 2006 Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan). Specifically, the Introduction of the Draft Report states that "[t]he proposed amendments will include revisions to these objectives for the reasonable protection of ... agriculture ... beneficial uses" In comparison, the statement in Section 4.1 that "[t]he State Water Board based the Southern Delta EC objectives on the calculated maximum salinity applied water which sustains 100 percent yields ..." (emphasis added). We believe it important that south Delta salinity objectives be set to *reasonably* protect the agricultural beneficial use – not sustain 100 percent yields. It is incongruous that protection of 100 percent yields as a basis for setting objectives can be reasonable in light of the potential financial impacts from meeting such objectives.

Further, the Draft Report should discuss the need or value in setting salinity objectives downstream of Vernalis. In reviewing Section 4, we are in agreement with the statement in Section 4.2 that "point sources of salt in the southern Delta can have a minimal overall salinity effect." This point is further made in the subsequent regression analyses shown in Figures 4-2, 4-3, and 4-4. The question raised by this information in the Draft Report is why objectives need to be established for any Southern Delta location downstream of Vernalis. The data clearly indicates that the salinity at Vernalis is controlling, and that a water quality objective established and maintained at Vernalis would result in appropriate salinity water quality throughout the Southern Delta.



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We also recommend that the Draft Report include information on the variability of EC measurements, particularly within the context of the estimated impact of the City of Tracy discharge. In Section 4.4.2, the Draft Report estimates the increase of EC resulting from the City of Tracy's wastewater discharge would only be 3 to 11 $\mu\text{S}/\text{cm}$. This impact range is likely well below the variability of the EC measurements, and may well be lost in the background noise of the data. We request that the Draft Report include an estimate of the variability of EC measurements, and whether the estimated increase resulting from any Southern Delta point source discharger can even be accurately measured in the receiving water.

The Draft Report should evaluate the scientific basis for the limits of the Southern Delta salinity objectives. The Draft Report in Section 4.3 discusses the effects of salinity in the Southern Delta, focusing in Section 4.3.1 on agricultural supply beneficial use. While there is much discussion about Dr. Hoffman's report and his main conclusions and recommendations, one issue not addressed is the boundaries of the Southern Delta. As Stockton is located several miles downstream of the closest compliance point (Brandt Bridge), there is considerable controversy about whether Stockton's wastewater discharge is in the "general area" of the compliance locations as suggested in the Bay-Delta Plan. As a technical basis for evaluation of the salinity water quality objectives, it behooves the State Board staff to determine, with scientific justification, the boundaries of the "general area" to which the water quality objectives must apply.

In summary, the Draft Report clearly indicates that the salinity at Vernalis is reflected in the salinity throughout the Southern Delta and that the point discharges downstream of Vernalis have a de minimus impact on Southern Delta salinity. However, the Draft Report does not consider the need to maintain compliance points downstream of Vernalis. Additionally, the Draft Report is silent on the defined boundaries of the Southern Delta. Should the Bay-Delta Plan revisions remove all compliance points other than the San Joaquin River at Vernalis, the boundaries of the Southern Delta become a mute point. Otherwise, defining those boundaries is critical to the Stockton discharge.



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