2/16/10 Bd Mtg Item 9
U.C. Davis
Deadline: 2/3/10 by 12 noon

UNIVERSITY OF CALIFORNIA, DAVIS

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February 3, 2010

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100

SUBJECT: COMMENTS TO A-1988—February 16, 2010, Board Workshop

Thank you for the opportunity to comment on the Draft Order. The University welcomes a timely, science-based process to establish an effluent limit for electrical conductivity (EC) that protects all beneficial uses. Over the past eight years, the University has actively worked with the Regional Board and other dischargers to study and resolve this complex issue. As noted the Draft Order, the University devoted considerable effort in 2004 to develop a site-specific model with the goal of establishing a protective water quality standard (Grattan Report). The Grattan Report concluded that EC values of up to 1,100 µmhos/cm would be protective of downstream agricultural (AGR) beneficial uses.

An evaluation of the Grattan Report, along with a review of numerous other models and a summary of the underlying science, was recently completed by Dr. Glenn J. Hoffman. Dr. Hoffman's report, *Salt Tolerance of Crops in the Southern Sacramento-San Joaquin Delta* (Hoffman Report) highlights the challenges associated with setting an appropriate limit for EC. As the Hoffman Report notes, many of the previously proposed limits for EC are based a few laboratory experiments for beans conducted more than 30 years ago. While the Hoffman Report provides recommendations for research to improve future modeling efforts, that study's findings have only strengthened the University position that the Grattan Report provides a solid, reasonable foundation for setting a protective site-specific effluent limit for the Arboretum Waterway and Putah Creek—especially given the fact that there is no evidence that historical EC levels have negatively impacted downstream agricultural uses of the water.

The University supports the approach suggested in the Order in evaluating the standard needed protect municipal water quality (MUN) beneficial uses. Since 1,100 µmhos/cm is within the range between the recommended and upper level secondary MCL for EC, the University believes this value is also protective of MUN beneficial uses.

In summary, the University supports the terms outlined in the Draft Order. The University will work with the Regional Board to timely provide whatever additional information may be necessary to establish a final effluent limit for EC. However, it is our position that the previously submitted information is already sufficient to establish 1,100 µmhos/cm as the protective limit. Through aggressive source control and/or bringing on new, lower-EC water supplies, the University should be able to fully comply with the 1,100 µmhos/cm effluent limit, without having to rely on dilution factors.

Sincerely,

David L. Phillips, P.E.
Director, Facilities Management - Utilities

c: Michael Fan, Facilities Management – WWTP
Susan Fields, EH&S