



## CITY OF TRACY

### Public Works Department

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Salinity-1-31-06  
Workshop

January 19, 2006

State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

Attention: Selica Potter, Acting Clerk to the Board

Subject: Comment Letter – 1/31/06 Board Workshop on Salinity

Dear Board Members:

The City of Tracy is concerned with how the 1995 Delta Plan (Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary, 95-1WR, May 1995) objective for salinity is being applied to Tracy's wastewater discharge by the Central Valley Regional Water Quality Control Board (RWQCB) staff. The RWQCB staff has interpreted the 1995 Delta Plan to require Tracy to achieve a 0.7 mmhos/cm Electrical Conductivity (EC) objective. Achieving this objective is not possible without constructing and operating a reverse osmosis treatment facility.

Tracy obtains approximately 60% of its drinking water supply from the Delta through the Delta-Mendota Canal. The ambient water quality in the Delta water supply frequently exceeds the 0.7 mmhos/cm EC objective. So the treated drinking water often exceeds 0.7 mmhos/cm EC prior to use by the community. Use of the water for domestic and industrial purposes increases the salinity prior to discharge as wastewater. The treated wastewater is ultimately discharged to the Old River. Tracy's largest source of salt in its wastewater discharge is from the potable drinking water supply.

Tracy has expended more than \$100 million for lower salinity drinking water. Tracy historically has utilized groundwater as a potable water supply. Up to 8,000 acre-feet of high salinity groundwater (1.25 mmhos/cm EC) had been pumped on an annual basis. In order to reduce the quantity of salt in the wastewater effluent and to deliver a less mineralized drinking water to the community, the City has obtained alternative surface water supplies so the native groundwater supply can be retired. Tracy is participating in a regional project with three other cities and the South San Joaquin Irrigation District to bring Stanislaus River water to the cities. Tracy's cost share of that project was \$50 million. The City additionally purchased additional water entitlements for Delta-Mendota Canal water for \$10 million and is expanding its potable water treatment plant at a cost of \$42 million to treat the Delta water. Tracy has been proactive to reduce the concentration of salt in wastewater effluent.

SWRCB  
January 19, 2006  
Page 2

In order to further reduce the salinity of the City's wastewater discharge, the City intends to implement additional practices to reduce the increase in salinity caused by water usage in the community. Industry will be regulated with limitations on salinity. These efforts will reduce salinity, but will not achieve a 0.7 mmhos/cm EC objective.

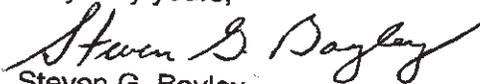
For your consideration are possible ways to assist cities in compliance with salinity objectives for treated municipal wastewater:

- Determine a reasonable incremental increase in salinity of wastewater discharges considering the drinking water supply salinity as a baseline.
- An exemption process for a city if the city can demonstrate the increase in salinity in the Delta attributable to the city's wastewater discharge is minimal.
- Consider the individual ions comprising the salinity (the types of salts), as not all minerals contained in wastewater are detrimental to agriculture or other beneficial uses of the Delta water.

Tracy has a population of 80,000 and is located within the legal boundary of the South Delta. Tracy discharges an average flow of approximately 9 million gallons per day into the Old River.

The City of Tracy appreciates the opportunity to submit comments. We are hopeful that the State Water Resources Control Board and the Central Valley Regional Water Quality Control Board can determine an equitable method to establish attainable water quality objectives.

Very truly yours,



Steven G. Bayley  
Deputy Director of Public Works



<b>FAX NUMBER:</b>	(916) 341-5620 fax
<b>DATE:</b>	1/19/06
<b>COMPANY:</b>	State Water Resources Control Board
<b>ATTENTION:</b>	Selica Potter, Acting Clerk to the Board

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<b>FROM:</b>	Steve Bayley	PUBLIC WORKS DEPT.
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TOTAL NUMBER OF PAGES BEING SENT, INCLUDING COVER PAGE IS: ( 3 )

SUBJECT: COMMENT LETTER - 1/31/06 BOARD WORKSHOP on Salinity

REMARKS: Original to follow in US Mail.

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