



**California League of Food Processors
 Comments Regarding:
 Draft Central Valley Salinity Project Economic Impact Report
 March 26, 2008**

The California League of Food Processors has reviewed the draft Central Valley Salinity Project Economic Impact Report and has the following general comments:

1. First and foremost, Tables 3.1.2 through 3.1.9 are all misleading. These tables attribute all of the annual salt loading in the central valley region to various industrial, agricultural, and municipal sources. However, this attribution method ignores the fact that across most of the Central Valley the source water for these sectors has elevated, and in numerous instances increasing, levels of salinity. It is CLFP's understanding that the major source of salt loading in the Valley is the importation of water into the region. Households, farms, and industrial facilities have essentially no control over the salinity of the water delivered to them. The Table below lists the supply water characteristics for several locations in the Central Valley. In these cases (and many others not listed) the user of the water may add little, or no, salt to the intake water and still discharge wastewater that is relatively saline.

Supply Water Characteristics of Selected Locations Near Food Processing Plants

Location	Electrical Conductivity (uS/cm)
Hilmar	982
Volta	1,200
Ripon	1,051
Gustine	1,750
Los Banos	1,842

Source: Hilmar SEP study, data from individual food processor

The Economic Impact Report should give a more balanced perspective of this issue by providing an overview of the movement of salt into the Central Valley, and what portion of annual salt load can be attributed to imported water and other natural sources. CLFP will take significant issue with this report unless this information is incorporated in the final version.