

## **SOUTH DELTA WATER AGENCY**

4255 PACIFIC AVENUE, SUITE 2  
STOCKTON, CALIFORNIA 95207  
TELEPHONE (209) 956-0150  
FAX (209) 956-0154  
E-MAIL [Jherrlaw@aol.com](mailto:Jherrlaw@aol.com)

**Directors:**

Jerry Robinson, Chairman  
Robert K. Ferguson, Vice-Chairman  
Natalino Bacchetti  
Jack Alvarez  
Mary Hildebrand

**Engineer:**

Alex Hildebrand  
Counsel & Manager:  
John Herrick

September 22, 2008

**Via Fax (916) 464-4645**  
**and e-mail [jdmarschall@waterboards.ca.gov](mailto:jdmarschall@waterboards.ca.gov)**

Mr. James D. Marshall, P.E., Senior Engineer  
California Regional Water Quality Control Board  
Central Valley Region  
11020 Sun Center Drive #200  
Rancho Cordova, CA 95670

Re: Tentative Waste Discharge Requirements for  
City of Stockton Regional Wastewater Control Facility

Dear Mr. Marshall:

The South Delta Water Agency submits the following comments to the proposed Waste Discharge Requirements for the City of Stockton's Wastewater Control Facility.

The draft permit conditions allow an annual average EC of 1,300 unless the permittee complies with other conditions regarding a long term salinity plan. If those conditions are not met, the EC limits revert to 700 from April through August and 1,000 from September through March.

Under most circumstances, the discharged water does not have any effect on salinity in the southern Delta, though it is a part of the overall salt balance of the estuary. Under some circumstances, the discharge could affect the salinity of the flows in the San Joaquin, which sometimes has a net flow upstream, and consequently affect the salinity standard measured at Brandt Bridge.

More importantly, the salinity objectives for the Central Delta are 450 EC, measured at San Andreas Landing, significantly downstream of the permittee's discharge point. Given the

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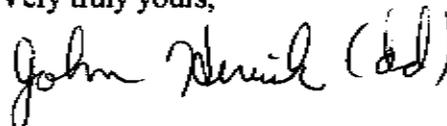
difference in what is allowed to be discharged and what the standard is, the question becomes to what degree does the discharge affect the quality of water in the channels needed for local agricultural diversions?

In the southern Delta, the City of Tracy's discharge is directly into an area where standards are regularly exceeded and adverse impacts to agriculture occur. The City of Stockton's discharge is into a much larger channel, in an area with better water quality (as to EC). It therefore may be that the salinity of the discharge is adequately diluted so that no adverse impacts occur to local agriculture.

The SDWA encourages the Regional Board and the City of Stockton to make sure the above-referenced dilution is actually occurring. If modeling or other data indicate dilution is not occurring, then the parties should work to develop a program whereby the discharge is adequately dispersed, diluted, or cleaned up in order that in-channel water quality is above the standard. SDWA is willing to participate in any such process.

Please feel free to contact me if you have any questions.

Very truly yours,

A handwritten signature in cursive script that reads "John Herrick (dd)".

JOHN HERRICK

JH/dd

cc: Dan Nomellini, Esq.  
Mr. Mark Madison

**Dictated by writer signed  
in his absence to avoid delay.**