



CITY OF TRACY

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P.O. Box 2000, Sacramento, CA, 95812-2000

Comments on the Strategic Workplan for the San Francisco Bay/Sacramento-San Joaquin Delta, Resolution No. 2007-0079.

Dear Ms Riddle:

The City of Tracy appreciates the opportunity to provide comments regarding the Workshop on the Strategic Workplan for the San Francisco Bay/Sacramento-San Joaquin Delta, Resolution No. 2007-0079. Our comments are focused on Attachments A (Actions already committed to) and B (Actions to be evaluated and further defined) for Resolution No. 2007-0079. Specifically, the City's comments are most concerned with salinity control, dissolved oxygen studies, ammonia toxicity issues, and the need for a coordinated Delta monitoring program.

Salinity Control Issues

The City has recently responded to Regional Board requests for various NPDES Permit Studies, several of which required workplans for source control related to salinity in the South Delta and Tracy's effluent limits. For this reason, the City recommends that dischargers be active members of the development and implementation of the CV-SALTS plan and actions to review the southern Delta salinity objectives in the Bay-Delta Water Quality Control Plan. The plan and objectives should be reviewed in terms of a comprehensive evaluation of all sources of salinity, natural variability of salinity in the Delta (time and space), and a thorough assessment of potential impacts to the attainment of beneficial uses as affected by salinity by season and location.

Southern Delta Dissolved Oxygen (DO) Studies

This portion of the strategic workplan should be viewed in the larger context of nutrient enrichment, including ammonia studies, flow regimes, blue-green algae monitoring, and the Pelagic Organism Decline (POD). Discharger representatives should be included in any decision process associated with Delta DO issues and recognition should be made of the complexity of issues determining DO and the potential effects of low DO. This comprehensive review of information will be needed prior to establishment of an Old and Middle Rivers DO TMDL.

Ammonia Toxicity Issues

Although the City's discharge is not currently of concern for ammonia concentrations or ammonia-caused toxicity, we recommend careful consideration of the complexity of ammonia studies for the Delta. There are questions about what beneficial uses are to be

protected, what studies are needed, and the true sources, fate, transport, and magnitude of effect of ammonia in the Delta. The City recommends that dischargers be included in the evaluation of these studies as being part of an Ammonia Studies Steering Committee. The fate, behavior, and toxicity of ammonia is complex and deserves careful consideration in relation to effluent quality and regulations.

Comprehensive Monitoring Program

Although excellent Bay and Delta monitoring exists in various forms, the City agrees that there is a need for a comprehensive, coordinated program that will meet the needs of all potential stakeholders. The program should be both spatially complete and long term in nature and should emphasize the entire Delta. Data gaps in current monitoring should be filled thoughtfully and on the basis of a comprehensive and coordinated plan that avoids all duplication of effort. The reassessment of beneficial uses should be evaluated as part of the program. In addition, the creation of the program should involve dischargers as active participants; the plan should recognize the importance of compliance monitoring information and discharger's special studies as important components of the database. It is likely that a newly-created entity will be required to oversee the program (such as SFEI).

Thank you for the opportunity to provide feedback on these important workshop topics.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Steven G. Bayley".

Steven G. Bayley

Deputy Director of Public Works