



# County of Santa Cruz

## HEALTH SERVICES AGENCY

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ENVIRONMENTAL HEALTH

August 11, 2004

Matthew Keeling, P.E.  
CRWQCB – Central Coast Region  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401

RE: New NPDES Permit for the Existing South County Regional Wastewater Authority, Gilroy-Morgan Hill Municipal Wastewater Facility, the Cities of Gilroy and Morgan Hill, and Indirect Dischargers of Santa Clara County, Board Order No. R3-2004-0099, NPDES No. CA0049964

Dear Mr. Keeling,

At their August 10, 2004, meeting the Santa Cruz County Board of Supervisors provided direction to its staff to voice the Board's strongest opposition to the above referenced permit. The paramount basis for Santa Cruz County's opposition to the discharge of tertiary-treated wastewater to the Pajaro River continues to be the direct impact to Pajaro Valley residents and the lower Pajaro River environment, potential flood issues, and surface and groundwater degradation from the actions and decisions made by others in the upper watershed and elsewhere. It is not apparent to the County of Santa Cruz that exhaustive or comprehensive efforts have been made to retain this water for possible re-use in its area of origin. The matter has also never been discussed at the Pajaro River Watershed Flood Prevention Authority, an entity charged with developing collaborative solutions from the four counties on flooding matters originating throughout the watershed.

Technical staff of the County of Santa Cruz has reviewed the staff report and attachments, and although staff acknowledge a tight set of permit conditions, concern over potential flood issues and water quality degradation persists. Discharge of tertiary-treated water are being considered into flows in the Pajaro River that range from approximately 300 cubic feet per second (cfs) and 9,300 cfs, as measured at the USGS gage at Chittenden. In water year 2003, which included a relatively mild winter, the lower end of this range occurred on approximately 30 days, as published by the US Geological Survey, for the Chittenden gaging station (USGS Water Data Report CA-03-2). The number of days drops in dry years and increase significantly in average to wet years.

Item No. 20 Attachment No. 7  
September 10, 2004 Meeting  
SCRWWA WWTP

Flood prevention staff has no idea of discharges in transit above Chittenden including Santa Clara County tributaries and the San Benito River. Generally the Santa Clara Valley Water District calls Santa Cruz County staff to inform them of potential wet weather alterations to reservoir release schedules. The travel time for natural and altered discharges arriving at the Chittenden gage is unknown to County of Santa Cruz staff. Potential flood flows from Corralitos Creek (below Chittenden) occur in a three-hour time of concentration, a smaller time increment than the likely travel time of Santa Clara County tributaries and the San Benito River. The point is that discharge as measured at Chittenden provides neither adequate protection nor notification to lower watershed entities that higher flows in the upper watershed have not yet been detected at Chittenden. The County would like to remind the Regional Water Quality Control Board that the San Benito River is 70 miles long and may deliver peak flows to Chittenden 30 hours after storms have ceased in Santa Cruz County. Given the very difficult settlement faced by the County of Santa Cruz in regards to 1995 flooding, the uncertainty in travel times of peak flows in the upper watershed, and the potential for extreme variations in weather in any given storm cell, leaves our Board with little room for comfort.

Incremental additions to water surface elevations are also under analyzed for the Pajaro River lagoon and river mouth environment. Upon review of these flow ranges; one would assume that the river mouth is continuously open. No condition in the permit requires the dischargers to confirm status or elevation of the lagoon/river mouth environment when discharges are to be made. The County of Santa Cruz strongly opposes any potential increases in the frequency of mechanically breaching the river mouth, which may be driven by additional discharges to the Pajaro River.

Concerns also persist about probable degradation of surface water quality, groundwater quality, and about the fate of chemicals retained by fine grained sediments in the river channel or lagoon. Table 11 in the proposed discharge requirement order suggests surface water quality degradation of the Pajaro River from effluent. Impacts to the lagoon or estuarine water quality are under analyzed and no water or sediment quality monitoring appears to be required.

Hydrogeologically, the reach of the Pajaro Valley from Chittenden to approximately Murphy's Crossing is a recharge area. Surface water infiltrates through the wetted perimeter of the channel bottom into the groundwater basin. This reach of the groundwater basin is the forebay to the confined aquifers, which underlie the valley floor. Groundwater quality is already degraded there from elevated levels of Boron, Sulfate, TDS, chlorides and other constituents carried by the river. Lines of equal concentration of these constituents diminish with distance away from the river.

The Pajaro Valley Water Management Agency (PVWMA) will have to address existing inland groundwater quality degradation in subsequent phases of their water supply planning. The beneficial uses of groundwater are already at risk in this locale and the County of Santa Cruz is not confident that additional discharges of tertiary-treated water will not include virus, pathogen or pharmaceutical compounds as well as elevated levels of naturally occurring elements. Groundwater quality monitoring in the forebay area of the Pajaro Valley groundwater basin is not included in the monitoring or reporting program.

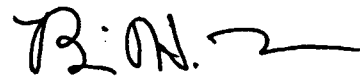
County of Santa Cruz technical staff is of the opinion that options for transport or re-use of the tertiary-treated water using the PVWMA pipeline have not been adequately explored by Authority or Regional Board staff. Current water supply planning in the Pajaro Valley calls for the use of tertiary-treated water blended with imported water to meet irrigation demands. The possible transport or re-use of this discharge, using the PVWMA pipeline as a conduit has not been analyzed.

For all of the above reasons staff must state its Board's strongest objection to the New NPDES Permit for the Existing South County Regional Wastewater Authority, Gilroy-Morgan Hill Municipal Wastewater Facility, the Cities of Gilroy and Morgan Hill, and Indirect Dischargers of Santa Clara County, Board Order No. R3-2004-0099, NPDES No. CA0049964.

Sincerely,



Robert L. Kennedy, R.E.H.S.  
Environmental Health Director



For Thomas L. Bolich  
Director of Public Works

cc: CAO  
Board of Supervisors  
HSA Administration  
County Counsel  
Planning Department  
Monterey County Environmental Health  
City of Watsonville  
Pajaro Valley Water Management Agency  
AMBAG  
Monterey Water Resources Agency