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PUBLIC WORKS DEPARTMENT

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April 21, 2014

*Via Electronic Mail Only*

Ms. Betty Yee  
Senior Water Quality Control Engineer  
Regional Water Quality Control Board  
Central Valley Region  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670  
[betty.yee@waterboards.ca.gov](mailto:betty.yee@waterboards.ca.gov)

Re: Comments on the proposed Amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins (Variance Program for Salinity)

Dear Ms. Yee:

The City of Tracy (Tracy) would like to thank the Regional Water Quality Control Board for the Central Valley Region (Regional Board) for addressing the salinity issue and proposing a variance process for implementation of water quality objectives for salinity. Tracy is a city with a population of approximately 83,000. Wastewater from Tracy is collected, treated and discharged into Old River in the south Delta. Salinity in the south Delta is an extremely important issue for local agriculture.

Tracy has made significant strides in reducing the concentration of salts in its wastewater effluent. And Tracy continues to be proactive in reducing its salinity. Tracy is participating with a private entity to proceed with a desalination project utilizing treated wastewater as an industrial water source with the ultimate goal of further reducing the salinity of Tracy's wastewater effluent.

The Variance Program for Salinity as proposed by the Regional Board would be beneficial in the management of salinity. The changes in salinity in Tracy's wastewater effluent are dependent upon, to a great degree, the source of potable water supply. During drought years increased volumes of highly saline native groundwater from wells are anticipated to be pumped to provide municipal water supply, resulting in increased levels of salinity in the wastewater effluent. Tracy is utilizing aquifer storage and recovery to minimize the use of the native groundwater, but during droughts native groundwater will need to be utilized to meet the community water demand. The Variance Program would provide a tool to address this type of temporary condition, as well as other potential temporary excursions above salinity standards.

Think Inside the Triangle™ 

Tracy supports the work performed by the Regional Board in addressing the Central Valley salinity issue, through CV-SALTS, the process for re-evaluation of the Delta salinity standards and this proposed Variance Program for Salinity. Tracy recommends the Regional Board adopt the amendments to the Basin Plans as described in the Draft Staff Report dated March 2014.

Very truly yours,



Steven G. Bayley  
Project Specialist, Public Works Department