



DEPARTMENT  
OF UTILITIES

ENGINEERING  
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July 1, 2010

Ms. Holly Grover  
Water Quality Control Engineer  
California Water Quality Control Board  
Central Valley Division  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95870-6114

**SUBJECT: COMMENTS ON THE DRAFT DRINKING WATER POLICY  
RESOLUTION**

Dear Ms. Grover:

Thank you for the opportunity to provide comments on the Draft Drinking Water Policy Resolution. The City of Sacramento Stormwater Management Program has been an active participant in the Drinking Water Policy Workgroup for several years dedicating staff time and providing technical services on model development and source identification. The State of California regulates the City as both a municipal drinking water supplier and as an urban runoff National Pollutant Discharge Elimination System (NPDES) discharger. We appreciate the Central Valley Regional Water Board's efforts to develop the policy based on sound science and quantitative assessments of costs and benefits of any policy to the people of the State of California. Overall, we support the draft resolution, but request that you consider the following issues that would better capture the progress of the group on the "virtual" treatment plant development and the Watershed Analysis Risk Management Framework (WARMF) modeling. These efforts are close enough to completion and their potential usefulness is great enough to merit completion when funds become available. The City requests incorporation of the following comments into the resolution:

1. Finding 30 of the resolution should include more detail on the drinking water treatment evaluations and the WARMF analytical models. There is no discussion or description of these rather significant and nearly complete work efforts. Specifically, it should be documented what these efforts are, how far along they are, and their benefits to the Regional Board and stakeholder activities. **The City suggests the following findings be inserted as part of or following Finding 30:**



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An evaluation was performed to consider the necessary additional drinking water treatment facilities for future (2030) conditions under varying assumptions of future projected drinking water regulations. These "virtual" treatment plants were developed to characterize existing drinking water treatment facilities that use Delta or upstream waters. Based on the virtual treatment facilities and projected source water quality from other modeling, the Regional Board and stakeholders could project future improvement requirements and estimate the associated costs. A study report was prepared but not finalized.

A watershed model was developed based on the Watershed Analysis Risk Management Framework (WARMF) toolsets for the Sacramento River watershed to Hood and the San Joaquin River watershed to Vernalis. This model considers tributary, point, non-point and land use based sources. The model can next be extended to interact with Delta models to provide tools to assess the impacts and benefits of treatment and control measures in the watersheds at the source water intake locations. The model could also be used to assess data gaps and monitoring needs. The model calibration is nearly complete, however, a final report has not been finalized.

2. Resolution 4 acknowledges the importance of the "existing models" and those "under development" in the context of better application of monitoring data. However, the City requests that the resolution be modified to specifically identify completion of the treatment alternatives and WARMF modeling studies in Resolution 5 with the addition of the following item:

Finalize the drinking water treatment facility study report and complete the calibration and verification of the WARMF model for both the Sacramento River and the San Joaquin River watersheds. A similar source, fate and transport model should be developed for the Delta to interface with these watershed models.

Thank you for your efforts on this matter and the opportunity to provide comments. Please let me know if you have additional comments.

Sincerely,



Sherill Huun

Supervising Engineer