TO: Gordon Innes, P.E.
Senior Water Resource Control Engineer
State Water Resources Control Board
Division of Water Quality

FROM: Anne Olson, P.E.
Senior Water Resource Control Engineer
CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD
SACRAMENTO OFFICE

DATE: 14 June 2012

SUBJECT: **APPROVAL OF ANTIDEGRADATION ANALYSIS**
CALAVERAS COUNTY WATER DISTRICT
LA CONTENTA WASTEWATER TREATMENT FACILITY
CALAVERAS COUNTY

I have reviewed the report titled *Antidegradation Analysis Demonstrating Use of Less Than 10 Percent of Sub-Basin Assimilative Capacity*, which we received from you on 8 June 2012. The report was submitted to the State Water Resources Control Board (State Water Board) as part of Calaveras County Water District's Notice of Intent to apply for coverage under the General Waste Discharge Requirements for Landscape Irrigation Uses of Municipal Recycled Water (Water Quality Order No. 2009-0006-DWQ, General Permit).

Water Quality Order 2009-0006-DWQ implements the State Water Board's Recycled Water Policy, which was adopted on 3 February 2009 under State Water Board Resolution 2009-0011, and specifically requires that discharges regulated under the General Permit comply with applicable provisions of the Recycled Water Policy (Specification B.2).

Paragraph 9 of the Recycled Water Policy states, in part:

> Landscape irrigation with recycled water in accordance with this Policy is to the benefit of the people of the State of California. Nonetheless, the State Water Board finds that the use of water for irrigation may, regardless of its source, collectively affect groundwater quality over time. The State Water Board intends to address these impacts in part through the development of salt/nutrient management plans described in paragraph 6.
> …
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> (2) A project that meets the criteria for a streamlined irrigation permit and is within a basin where a salt/nutrient management plan satisfying the provisions of paragraph 6(b) is being prepared may be approved by the Regional Water Board by demonstrating through a salt/nutrient mass balance or similar analysis that the project uses less than 10 percent of the available assimilative capacity as estimated by the project proponent in a basin/sub-basin (or multiple projects using less than 20 percent of the available assimilative capacity as estimated by the project proponent in a groundwater basin).

Based on the report submitted by Calaveras County Water District, I concur with the determination that the project will not use more than 10 percent of the available assimilative capacity of the affected sub-basin for salinity. The report did not specifically address plant nutrients such as nitrogen. However, based on my professional experience and judgment, the project is not likely to use more than 10 percent of the available assimilative capacity of the affected sub-basin for nutrients if the discharge is managed in compliance with:

a) the General Permit; and
b) the Irrigation Management Plan that is required to be submitted to the State Water Board prior to commencement of the discharge pursuant to Provision C.5.b of the General Permit.

Please contact me at (916) 464-4740 if you have any questions.

cc: Diana Messina, CVRWQCB
Jim Marshall, CVRWQCB
Wendy Wyels, CVRWQCB
Lixin Fu, CVRWQCB
Bill Perley, Calaveras County Water District
John Kramer, Condor Earth Technologies, Inc.