



## CITY OF STOCKTON

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Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
PO Box 100  
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**DRAFT SUBSTITUTE ENVIRONMENTAL DOCUMENT (SED) IN SUPPORT OF POTENTIAL CHANGES TO THE WATER QUALITY CONTROL PLAN FOR THE SAN FRANCISCO BAY-SACRAMENTO/SAN JOAQUIN DELTA ESTUARY (BAY-DELTA PLAN): SAN JOAQUIN RIVER FLOWS AND SOUTHERN DELTA WATER QUALITY**

The City of Stockton is very concerned about the proposed alternative based on potential water supply impacts and wastewater salinity discharge limits. For the reasons listed below, Stockton believes that both an inappropriate alternative was selected based on the Draft SED that did not adequately evaluate all impacts.

**WATER SUPPLY**

The Eastern San Joaquin Groundwater Basin was declared, by the Department of Water Resources in 1980, to be in a state of critical overdraft. To increase the supply of surface water, the City of Stockton teamed with Stockton East Water District (SEWD) in the 1970's to construct water treatment capabilities. Additionally, in 1983 SEWD contracted with the Bureau of Reclamation for 75,000 acre-feet of water from New Melones Reservoir annually. Subsequently, the City and SEWD constructed a \$65,000,000 conveyance to move that water from the Stanislaus River. Consequently, groundwater use has significantly declined and groundwater levels have dramatically improved. Any reduction in surface water supply that results in increased groundwater pumping is a significant negative impact.

The Draft SED has not adequately addressed the potential water supply impacts to the City of Stockton and the Eastern San Joaquin Groundwater Basin that could result from the various alternatives. A clear, consistent assessment of the reduction in water availability to SEWD with the association impacts must be addressed.

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**SALINITY**

The Draft SED properly states that control of Stockton's wastewater discharge, as well as other Publicly Owned Treatment Works (POTW's), will not significantly affect ambient electro conductivity (EC) levels in the Delta. The Draft SED relies on available information, including modeling work performed by Department of Water Resources (DWR) in 2007 and more recent analysis prepared by the US Bureau of Reclamation in 2011, to reach this conclusion. However, in Table 17.1 and elsewhere in the document, the proposed alternative notes that there would be significant and unavoidable impacts only on the POTW's. The significance is clearly stated in estimating construction costs for reverse osmosis to remove salinity from the wastewater. However, the construction cost estimates used are unrealistically low and there is no evaluation of operational costs or greenhouse gas emission issues with the energy demand of such a treatment system. Consideration of the cost of compliance in conjunction with the lack of improved water quality highlights the ludicrous nature of this alternative.

As noted above, Stockton has been actively working to reduce dependence on groundwater, including the recent construction of a \$200,000,000 surface water treatment plant. As a result, supply water salinity and subsequent wastewater discharge salinity, has been declining over the past several years. A reduction in surface water supply that would have a negative impact on supply water salinity and subsequent wastewater salinity is clearly counterproductive.

We appreciate the opportunity to provide these comments and, in particular, generally support the comments by SEWD and the Central Valley Clean Water Association.

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