



T e c h n o l o g y i n b a l a n c e w i t h n a t u r e

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October 17, 2012

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



**Sacramento Regional Wastewater
Treatment Plant**

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Elk Grove, CA 95758-9550
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**Subject: Bay-Delta Plan Review – Other Comments: Accounting for the
Sacramento Regional Wastewater Treatment Plant Flows**

Dear Ms. Townsend:

Board of Directors
Representing:

- County of Sacramento
- County of Yolo
- City of Citrus Heights
- City of Elk Grove
- City of Folsom
- City of Rancho Cordova
- City of Sacramento
- City of West Sacramento

The Sacramento Regional County Sanitation District (SRCS D) appreciates the opportunity to provide these additional comments and further input for the State Water Resources Control Board’s (SWRCB) Bay Delta Plan. In this regard, the SWRCB’s revised August 16, 2012 notice for the workshops states: “As part of this solicitation, the State Water Board is also requesting that interested persons, whether they are participating in the workshops or not, submit all other information that they believe the State Water Board should be considering in Phase II of the State Water Board’s review of the Bay-Delta Plan.”

The purpose of this additional comment letter is to remind the SWRCB that when the modeling and environmental review are conducted regarding any proposed modifications to the Bay Delta Plan, the SWRCB and other parties should not assume that the amount of discharges from SRCSD’s Sacramento River Wastewater Treatment Plant (SRWTP) will continue at existing or previous levels. Instead, any such modeling and related analysis should account for the contingency that SRCSD may substantially decrease its treated wastewater discharges to the Sacramento River in order to pursue recycled water projects. In this regard, Figure 4 of the 2006 Bay-Delta Plan provides that the average daily discharges from SRWTP are one of the itemized components used in calculating the Delta Inflow portion of the Net Delta Outflow Index (NDOI) computation. (For convenience, a copy of Figure 4 is enclosed herewith.) Since those calculated discharge quantities are likely to substantially decrease in the future, the modeling and environmental review for the Plan Update should discuss and appropriately account for this contingency.

- Stan Dean
District Engineer
- Ruben Robles
Director of Operations
- Prabhakar Somavarapu
Director of Policy & Planning
- Karen Stoyanowski
Director of Internal Services
- Joseph Maestretti
Chief Financial Officer
- Claudia Goss
Public Affairs Manager

¹ The District could also pursue water rights applications under Water Code Section 1486, and pursue dedications of water for environmental and ecosystem benefits under Water Code Section 1212 and 1707. Such projects would also affect how discharges from SRCSD’s treatment plant should be accounted for in calculating Delta Inflow under the NDOI.

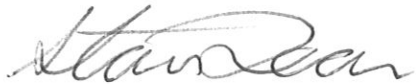
Ms. Jeanine Townsend

October 17, 2012

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SRCSO greatly appreciates the SWRCB's consideration of these additional comments. If the SWRCB and its staff have any further questions or need additional information regarding these matters, please contact me at (916) 875-9101 (deans@sacsewer.com) or Prabhakar Somavarapu at 916-875-9116 (somavarapup@sacsewer.com).

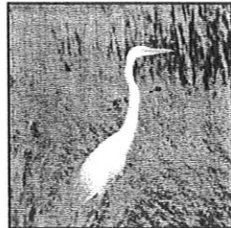
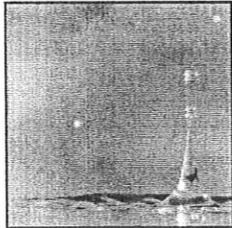
Sincerely,

A handwritten signature in cursive script that reads "Stan Dean".

Stan Dean
District Engineer

cc: Prabhakar Somavarapu, Director of Policy and Planning

Enclosure: Figure 4 of the 2006 Bay-Delta Plan



Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary

December 13, 2006



CALIFORNIA
Water Boards
STATE WATER RESOURCES CONTROL BOARD
CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

Division of Water Rights
December 2006

FIGURE 4

NDOI and PERCENT INFLOW DIVERTED ¹

The NDOI and the percent inflow diverted, as described in this figure, shall be computed daily by the DWR and the USBR using the following formulas (all flows are in cfs):

$$NDOI = DELTA INFLOW - NET DELTA CONSUMPTIVE USE - DELTA EXPORTS$$

$$PERCENT INFLOW DIVERTED = (CCF + TPP) \div DELTA INFLOW$$

where $DELTA INFLOW = SAC + SRTP + YOLO + EAST + MISC + SJR$

- SAC** = Sacramento River at Freeport mean daily flow for the previous day; the 25-hour tidal cycle measurements from 12:00 midnight to 1:00 a.m. may be used instead.
- SRTP** = Sacramento Regional Treatment Plant average daily discharge for the previous week.
- YOLO** = Yolo Bypass mean daily flow for the previous day, which is equal to the flows from the Sacramento Weir, Fremont Weir, Cache Creek at Rumsey, and the South Fork of Putah Creek.
- EAST** = Eastside Streams mean daily flow for the previous day from the Mokelumne River at Woodbridge, Cosumnes River at Michigan Bar, and Calaveras River at Bellota.
- MISC** = Combined mean daily flow for the previous day of Bear Creek, Dry Creek, Stockton Diverting Canal, French Camp Slough, Marsh Creek, and Morrison Creek.
- SJR** = San Joaquin River flow at Vernalis, mean daily flow for the previous day.

where $NET DELTA CONSUMPTIVE USE = GDEPL - PREC$

- GDEPL** = Delta gross channel depletion for the previous day based on water year type using the DWR's latest Delta land use study.²
- PREC** = Real-time Delta precipitation runoff for the previous day estimated from stations within the Delta.

and where $DELTA EXPORTS^3 = CCF + TPP + CCC + NBA$

- CCF** = Clifton Court Forebay inflow for the current day.⁴
- TPP** = Tracy Pumping Plant pumping for the current day.
- CCC** = Contra Costa Canal pumping for the current day.
- NBA** = North Bay Aqueduct pumping for the current day.

1 Not all of the Delta tributary streams are gaged and telemetered. When appropriate, other methods of estimating stream flows, such as correlations with precipitation or runoff from nearby streams, may be used instead.

2 If up to date channel depletion estimates are available they shall be used. If these estimates are not available, DAYFLOW channel depletion estimates shall be used.

3 The term "Delta Exports" is used only to calculate the NDOI. It is not intended to distinguish among the listed diversions with respect to eligibility for protection under the area of origin provisions of the California Water Code.

4 Actual Byron-Bethany Irrigation District withdrawals from Clifton Court Forebay shall be subtracted from Clifton Court Forebay inflow. (Byron-Bethany Irrigation District water use is incorporated into the GDEPL term.)