



# Review of Proposal from 2014 Wheeling Stakeholder Process

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## 2014 Wheeling Process

- From February to June of 2014, CAP Staff conducted a public process related to wheeling non-Project supplies
  - Five stakeholder meetings
  - Regular Board updates
  - White papers, models, and draft documents
- As part of that process, CAP Staff developed a proposal for water quality standards



## 2014 Wheeling Process

- Staff began with general policy concepts
  - No harm to the system
  - No harm to other customers
  - No harm to public health

*Particular focus was on constituents that could cause operational problems (e.g., nutrients that could cause algae), and finding standards that could withstand challenge and avoid inviting contractual disputes or unwanted regulatory scrutiny*



## 2014 CAP Staff Proposal

- The CAP Staff proposed reliance on the Primary Maximum Contaminant Load ("Primary MCLs") standards established by the U.S. EPA pursuant to the Safe Drinking Water Act
- Measurement/compliance at the point of introduction
  - i.e., no use of the CAP aqueduct for mixing/dilution

A screenshot of a document titled "National Primary Drinking Water Regulations". The document is a complex table with multiple columns and rows, containing various numerical values and text. The table is partially obscured by a blue and gold decorative graphic in the top right corner of the slide.

## 2014 CAP Staff Proposal

- In developing its proposal, CAP Staff consulted with Reclamation staff
  - The potential imposition of a strict “no degradation” standard was a shared concern
  - Using the CAP aqueduct to mix was also a concern
- Reliance on a clear, existing standard was viewed as beneficial
- The MCL standard is high, but not as high as having to match CAP water quality
  - e.g., a supply with arsenic of 9.0 could be introduced



## 2014 CAP Staff Proposal

- A range of comments was received
  - Some argued for case-by-case, with mixing
  - Others expressed concern about any diminishment
- The terminology created some confusion
  - Many assumed ‘drinking water standards’ were tougher than ‘no-degradation’
- No full consensus reached, but all parties recognized that standards involve trade-offs
  - Certainty versus flexibility
  - Differing distributions of costs, benefits and risks



## Status and Follow-on Activities

- Neither CAWCD nor Reclamation took a formal position on the CAP Staff Proposal
- However, it has served as a planning standard
  - NEPA review of Scottsdale's Harquahala groundwater importation project
  - Feasibility study of recovery wellfield at the Tonopah Desert Recharge Project site



## Total Dissolved Solids

- TDS did not receive extensive comment or review as part of the 2014 process
  - The Secondary MCL (500 PPM) was not viewed as appropriate
  - CAP Staff did convey that current TDS (~650 PPM) might serve as the standard
- However, in subsequent discussions and evaluation, CAP Staff have considered the use of the Numeric Standard established by the Salinity Control Forum
  - 747 PPM at Parker Dam



Questions?

