



Linda S. Adams
Secretary for
Environmental
Protection

California Regional Water Quality Control Board Central Valley Region

Katherine Hart, Chair

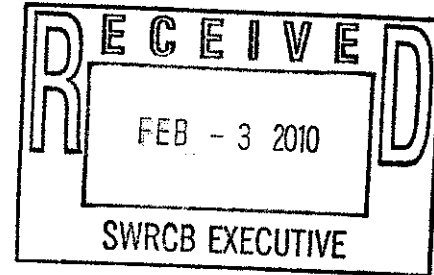
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**Arnold
Schwarzenegger**
Governor

3 February 2010

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor 95814
Sacramento, CA 95812-0100



COMMENTS FOR PETITION OF WASTE DISCHARGE REQUIREMENTS ORDER NO. R5-2008-0183 (NPDES NO. CA0077895) FOR THE UNIVERSITY OF CALIFORNIA, DAVIS, MAIN WASTEWATER TREATMENT PLANT;

SWRCB/OCC FILE NO. A-1988 - 16 FEBRUARY 2010 STATE WATER RESOURCES CONTROL BOARD MEETING

Thank you for the opportunity to comment on the 4 January 2010, draft State Water Resources Control Board (State Water Board) Water Quality Order (Draft Order) referenced above. The Draft Order remands Waste Discharge Requirements Order No. R5-2008-0183 (Adopted Permit) to the Central Valley Regional Water Quality Control Board (Central Valley Water Board) for the following actions:

1. Revise the Adopted Permit to shorten the time period for the site-specific electrical conductivity (EC) study update to a maximum of two years;
2. Within one year of completion of the site-specific study update, reevaluate reasonable potential for EC for both the MUN and AGR uses of Putah Creek and the Arboretum Waterway. If reasonable potential is found, reopen the permit to include appropriate water quality-based effluent limitations; and
3. Provide annual status reports to the State Water Board's Executive Director on compliance with the terms of the Draft Order.

The Central Valley Water Board agrees with the terms of the Draft Order. As you know, salinity is a complex issue and salinity control is a high priority for the Central Valley Water Board. Shortening the time for the Discharger to submit an updated site-specific EC study is appropriate. The State Water Board is in the process of reevaluating salinity standards in the South Delta as described in the 5 January 2010 final report by Dr. Hoffman, *Salt Tolerance of Crops in the Southern Sacramento-San Joaquin Delta* (Hoffman Report). The Hoffman Report provides guidance for developing site-specific salinity objectives. Our Board has been waiting for completion of the Hoffman Report before requiring the Discharger to update its site-specific EC study to maintain consistency with the approach being developed by the State Water Board. Now that the Hoffman Report is complete we agree that the Discharger must update and submit a site-specific EC study by December 2010.

California Environmental Protection Agency

There is one change to the Draft Order that we request. The Draft Order requires annual reporting of progress on the remanded NPDES Permit to the Executive Director. The Central Valley Water Board has always complied with orders issued by the State Water Board. I will be happy to provide annual reports to the State Water Board on this or any other matter, and do not believe there is a need for a formal Order to compel this reporting. Therefore, we respectfully request the State Water Board delete ORDER IV.3 on page 10.

Thank you again for the opportunity to respond to the Draft Order. If you have any questions, please contact Mr. Kenneth Landau at (916) 464-4726 or klandau@waterboards.ca.gov.



Pamela C. Creedon
Executive Officer

cc: Mr. Dave Smith, USEPA, Region IX, WTR-5, San Francisco
Mr. Phil Isorena, DWQ, State Water Resources Control Board, Sacramento
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Ms. Lori Okun, OCC, State Water Resources Control Board, Sacramento
Ms. Emel Wadhvani, OCC, State Water Resources Control Board, Sacramento