

CITY COUNCIL

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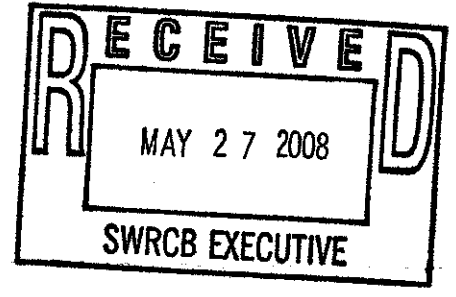
BLAIR KING,
City Manager

RANDI JOHL,
City Clerk

D. STEPHEN SCHWABAUER,
City Attorney

F. WALLY SANDELIN
Public Works Director

May 21, 2008



State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100
Attn: Ms. Jeanine Townsend
commentletters@waterboards.ca.gov

NPDES No. CA0079243

SUBJECT: COMMENTS TO A-1886 – JULY 15, 2008 BOARD MEETING

Dear Chair Doduc and Board Members:

The City of Lodi received and considered your letter dated May 12, 2008, and the accompanying draft Order for the review of Waste Discharge Requirements Order No. R5-2007-0113 (NPDES No. CA0079243) (WDRs) on the Board's own motion. As you know, the Central Valley Regional Water Quality Control Board issued the WDRs to the City for its White Slough Water Pollution Control Facility on September 14, 2007.

The City does not object to the State Water Board's adoption of the draft order. The Water Code authorizes the Board to review WDRs on its own motion. However, the City continues to believe that the WDRs are lawful. The City therefore respectfully submits that the Board should uphold the WDRs as issued upon review. If and when the Board proposes a draft Order, the City will provide detailed comments in support of the WDRs.

Please contact our counsel, Bobbi Larson at (916) 446-7979 or blarson@somachlaw.com if the City can be of further assistance.

Sincerely,

Charles E. Swimley, Jr., P.E.
Water Services Manager

CES/myn

cc: F. Wally Sandelin, Public Works Department
Del Kerlin, Wastewater Treatment Superintendent
Kathryn Gies, West Yost & Associates
Bobbi Larson, Somach, Simmons & Dunn