

1 Jennifer L. Spaletta – SBN: 200032  
2 David S. Green – SBN: 287176  
3 SPALETTA LAW PC  
4 Post Office Box 2660  
5 Lodi, California 95241  
6 Telephone: (209) 224-5568  
7 Facsimile: (209) 224-5589  
8 Attorney for Petitioner  
9 San Joaquin County Resource Conservation District  
10 on behalf of the San Joaquin County and Delta Water Quality Coalition



6 Kari E. Fisher – SBN: 245447  
7 CALIFORNIA FARM BUREAU FEDERATION  
8 2300 River Plaza Drive  
9 Sacramento, CA 95833  
10 Telephone: (916) 561-5665  
11 Facsimile: (916) 561-5691  
12 Attorney for Petitioner  
13 California Farm Bureau Federation

10 William J. Thomas – SBN: 67798  
11 Kelsey R. Blegen – SBN: 294561  
12 BEST BEST & KRIEGER LLP  
13 500 Capitol Mall, Suite 1700  
14 Sacramento, CA 95814  
15 Telephone: (916) 325-4000  
16 Facsimile: (916) 325-4010  
17 Attorneys for Petitioners  
18 Southern San Joaquin Valley Water Quality Coalition;  
19 Arvin-Edison Water Storage District; Wheeler Ridge-Maricopa  
20 Water Storage District; and Semitropic Water Storage District

16 [Email addresses for all counsel provided on the last page]

17 **BEFORE THE STATE WATER RESOURCES CONTROL BOARD**

18 IN THE MATTER OF PETITION OF  
19 SOUTHERN SAN JOAQUIN VALLEY  
20 WATER QUALITY COALITION,  
21 CALIFORNIA FARM BUREAU  
22 FEDERATION, AND SAN JOAQUIN  
23 COUNTY RESOURCE  
24 CONSERVATION DISTRICT ON  
25 BEHALF OF THE SAN JOAQUIN  
26 COUNTY AND DELTA WATER  
27 QUALITY COALITION FOR REVIEW  
28 OF ACTION AND FAILURE TO ACT  
BY CENTRAL VALLEY REGIONAL  
WATER QUALITY CONTROL BOARD

**SWRCB/OCC File No. A-2239(c)**

PETITIONERS' COMMENTS ON THE  
STATE WATER RESOURCES CONTROL  
BOARD'S DRAFT ORDER RELATING TO  
ORDER NO. R5-2012-0116

Date: August 5, 2014  
Time: 9 a.m.  
Location: 1001 I Street, Coastal Hearing Room,  
Sacramento, California

1 The Southern San Joaquin Valley Water Quality Coalition, the California Farm Bureau  
2 Federation, and the San Joaquin County Resource Conservation District on behalf of the San  
3 Joaquin County and Delta Water Quality Coalition (collectively, "Petitioners") submit these  
4 comments to the State Water Resources Control Board's ("State Board") draft order relating to  
5 petitions A-2239(a), A-2239(b), and A-2239(c). These petitions concern the California Regional  
6 Water Quality Control Board, Central Valley Region's ("Regional Board") adoption of  
7 Resolution No. R5-2012-0116, Waste Discharge Requirements General Order for Growers within  
8 the Eastern San Joaquin River Watershed that are Members of the Third-Party Group.

9 Petitioners do not oppose the State Board's draft order to review Waste Discharge  
10 Requirements Order No. R5-2012-0116 on its own motion.

11 Respectfully submitted,

12 Dated: July 29, 2014

SPALETTA LAW PC

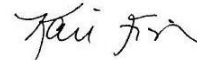


14 By: \_\_\_\_\_

JENNIFER L. SPALETTA  
Attorney for Petitioner SAN JOAQUIN  
COUNTY RESOURCE CONSERVATION  
DISTRICT

17 Dated: July 29, 2014

CALIFORNIA FARM BUREAU FEDERATION



19 By: \_\_\_\_\_

KARI E. FISHER  
Attorney for Petitioner CALIFORNIA  
FARM BUREAU FEDERATION

21 Dated: July 29, 2014

BEST BEST & KRIEGER LLP



24 By: \_\_\_\_\_

WILLIAM J. THOMAS  
Attorney for Petitioners SOUTHERN SAN  
JOAQUIN VALLEY WATER QUALITY  
COALITION; ARVIN-EDISON WATER  
STORAGE DISTRICT; WHEELER  
RIDGE-MARICOPA WATER STORAGE  
DISTRICT; SEMITROPIC WATER  
STORAGE DISTRICT

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**ADDITIONAL COUNSEL OF RECORD**

Ernest A. Conant, SBN: 89111  
Law Offices of Young Wooldridge, LLP  
1800-30<sup>th</sup> Street, Fourth Floor  
Bakersfield, CA 93301  
Telephone: (661) 327-9661  
Facsimile: (661) 327-0720

Attorneys for Petitioners  
Arvin-Edison Water Storage District; Wheeler Ridge-Maricopa  
Water Storage District; and Semitropic Water Storage District

**COUNSEL’S EMAIL ADDRESSES**

Jennifer Spaletta: [jennifer@spalettalaw.com](mailto:jennifer@spalettalaw.com)  
David Green: [david@spalettalaw.com](mailto:david@spalettalaw.com)  
Kari Fisher: [kfisher@cfbf.com](mailto:kfisher@cfbf.com)  
William Thomas: [William.Thomas@bbklaw.com](mailto:William.Thomas@bbklaw.com)  
Kelsey Blegen: [Kelsey.Blegen@bbklaw.com](mailto:Kelsey.Blegen@bbklaw.com)  
Ernest Conant: [econant@youngwooldridge.com](mailto:econant@youngwooldridge.com)

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**PROOF OF SERVICE**

I am employed in the County of San Joaquin; my business address is 225 West Oak Street, Lodi, California; I am over the age of 18 years and not a party to the foregoing action.

On July 29, 2014, I served a true and correct copy of:

PETITIONERS' COMMENTS ON THE STATE WATER RESOURCES CONTROL BOARD'S DRAFT ORDER RELATING TO ORDER NO. R5-2012-0116

[X] **BY U.S. MAIL.** By enclosing the document(s) in a sealed envelope addressed to the person(s) set forth below, and placing the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing of correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

Silverio Damian Planada en Accion 462 Gwinn Street P.O. Box 618 Planada, CA 95365	Fairmead Community and Friends 1225 Gill Avenue Madera, CA 93637
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[X] **BY ELECTRONIC MAIL (EMAIL).** By sending the document(s) to the person(s) at the email address(es) listed on the attached EMAIL SERVICE LIST.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: \_\_\_\_\_

\_\_\_\_\_  
DIANA MARTIN

## EMAIL SERVICE LIST

1  
2  
3 Nancy M. McDonough  
4 Kari E. Fisher  
5 California Farm Bureau Federation  
6 2300 River Plaza Drive  
7 Sacramento, CA 95833  
8 [kfisher@cfbf.com](mailto:kfisher@cfbf.com)  
9 [photz@cfbf.com](mailto:photz@cfbf.com)  
10 [nmcdonough@cfbf.com](mailto:nmcdonough@cfbf.com)

11 Mr. John Brodie, Watershed  
12 Coordinator  
13 San Joaquin County Resource  
14 Conservation District on behalf of the  
15 San Joaquin County and Delta Water  
16 Quality Coalition  
17 3422 W. Hammer Lane, Suite A  
18 Stockton, CA 95219  
19 [rvranglr@yahoo.com](mailto:rvranglr@yahoo.com)

20 Theresa A. Dunham  
21 Somach Simmons & Dunn  
22 500 Capitol Mall, Suite 1000  
23 Sacramento, CA 95814  
24 [tdunham@somachlaw.com](mailto:tdunham@somachlaw.com)

25 Perry Klassen  
26 Executive Director  
27 East San Joaquin Water Quality  
28 Coalition  
1201 L Street  
Modesto, CA 95354  
[pklassen@unwireddb.com](mailto:pklassen@unwireddb.com)

Laurel Firestone  
Community Water Center  
519 1212 Street  
Sacramento, CA 95815  
[laurel.firestone@communitywatercenter.org](mailto:laurel.firestone@communitywatercenter.org)

Phoebe Seaton  
California Rural Legal Assistance, Inc.  
2115 Kern Street, Suite 370  
Fresno, CA 93721  
[pseaton@crla.org](mailto:pseaton@crla.org)

Susana De Anda, Coordinator  
Asociacion de Gente Unida por el Agua  
311 W. Murray Avenue  
Visalia, CA 93291  
[susana.deanda@communitywatercenter.org](mailto:susana.deanda@communitywatercenter.org)

Bill Jennings  
California Sportfishing Protection Alliance  
3536 Rainier Avenue  
Stockton, CA 95204  
[deltakeep@me.com](mailto:deltakeep@me.com)

Michael R. Lozeau  
Lozeau Drury LLP  
420 12th Street, Suite 250  
Oakland, CA 94607  
[michael@lozeaudrury.com](mailto:michael@lozeaudrury.com)

Mike Jackson  
Law Office of Mike Jackson  
P.O. Box 207  
429 W. Main Street  
Quincy, CA 95971  
[mjatt@sbcglobal.net](mailto:mjatt@sbcglobal.net)

Carolee Krieger  
President  
California Water Impact Network  
808 Romero Canyon Road  
Santa Barbara, CA 93108  
[caroleekrieger7@gmail.com](mailto:caroleekrieger7@gmail.com)

Clay Rodgers  
Assistant Executive Officer  
Central Valley Regional Water Quality  
Control Board, Fresno Office  
1685 E Street  
Fresno, CA 93706-2020  
[crodgers@waterboards.ca.gov](mailto:crodgers@waterboards.ca.gov)

Kenneth D. Landau  
Assistant Executive Officer  
Central Valley Regional Water Quality  
Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6114  
[klandau@waterboards.ca.gov](mailto:klandau@waterboards.ca.gov)

1 Pamela C. Creedon  
2 Executive Officer  
3 Central Valley Regional Water Quality  
4 Control Board  
5 11020 Sun Center Drive, Suite 200  
6 Rancho Cordova, CA 95670-6114  
7 [pcreedon@waterboards.ca.gov](mailto:pcreedon@waterboards.ca.gov)

8 Robert Crandall  
9 Assistant Executive Officer  
10 Central Valley Regional Water Quality  
11 Control Board, Redding Office  
12 415 Knollcrest Drive  
13 Redding, CA 96002  
14 [rcrandall@waterboards.ca.gov](mailto:rcrandall@waterboards.ca.gov)

15 Adam Laputz  
16 Senior Water Resources Control  
17 Engineer  
18 Central Valley Regional Water Quality  
19 Control Board  
20 11020 Sun Center Drive, Suite 200  
21 Rancho Cordova, CA 95670-6114  
22 [awlaputz@waterboards.ca.gov](mailto:awlaputz@waterboards.ca.gov)

23 David P. Coupe  
24 San Francisco Bay Regional Water  
25 Quality Control Board  
26 1515 Clay Street, Suite 1400  
27 Oakland, CA 94612  
28 [dcoupe@waterboards.ca.gov](mailto:dcoupe@waterboards.ca.gov)

Lori T. Okun  
Office of Chief Counsel  
State Water Resources Control Board  
1001 I Street, 22nd Floor  
Sacramento, CA 95814  
[lokun@waterboards.ca.gov](mailto:lokun@waterboards.ca.gov)

Alex P. Mayer  
Office of Chief Counsel  
State Water Resources Control Board  
1001 I Street, 22nd Floor  
Sacramento, CA 95814  
[amayer@waterboards.ca.gov](mailto:amayer@waterboards.ca.gov)

Philip G. Wyels  
Office of Chief Counsel  
State Water Resources Control Board  
1001 I Street, 22nd Floor  
Sacramento, CA 95814  
[pwyels@waterboards.ca.gov](mailto:pwyels@waterboards.ca.gov)

Patrick E. Pulupa  
Office of Chief Counsel  
State Water Resources Control Board 1001 I  
Street, 22nd Floor  
Sacramento, CA 95814  
[ppulupa@waterboards.ca.gov](mailto:ppulupa@waterboards.ca.gov)

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
PO Box 100  
Sacramento, CA 95812-0100  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)