



**Department of Public Utilities**

Wastewater Management Division  
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April 16, 2014

Betty Yee,  
Senior Water Resource Control Engineer  
Regional Water Quality Control Board  
112020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670

Via electronic mail: [betty.yee@waterboards.ca.gov](mailto:betty.yee@waterboards.ca.gov)

**SUBJECT: Proposal for Amendments to the Water Quality Control Plan for the Sacramento River and the San Joaquin River Basins and the Water Quality Control Plan for the Tulare Lake Basin (Basin Plans) to add Policies for Variances from Surface Water Quality Standards for Point Source Dischargers, Variance Program for Salinity, and Exception from Implementation of Water Quality Objectives for Salinity—Notice of Public Hearing June 2014**

Dear Ms. Yee:

The City of Fresno supports the proposed amendments to the Basin Plans to add policies for variance from surface water quality standards for point source dischargers (Variance Policy), a multiple discharger variance program for salinity (Salinity Variance Program) and an exemption from implementation of water quality objectives for salinity (Salinity Exception Program).

The City of Fresno is an active member and supporter of the Central Valley Salinity Alternative for Long-Term Sustainability (CV-SALTS), the stakeholder coalition working on a strategic initiative to address salinity and nutrient issues in surface and ground waters of the Central Valley. CV-SALTS, the Central Valley Board and the State Boards are in the process of developing Salinity and Nutrient Management Plans (SNMPs).

The City concurs with the Regional Board's statement in that *"the need exists to set current permit limitations at a level that protects water quality but does not compel the irretrievable commitment of major resources in advance of completion of the SNMPs."* (Amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins and the Water Quality Control Plan for the Tulare Lake Basin- Draft Staff Report, March 2014).

It also concurs with the Regional Board's recommendation to adopt Alternatives 2 and 3 for cities under the Salinity Exception Program that will provide conditional waivers on a case by case basis for discharges under Waste Discharge Requirements and will take in consideration the effects of water conservation and drought conditions when developing the conditional waiver provisions.



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Ms. Yee

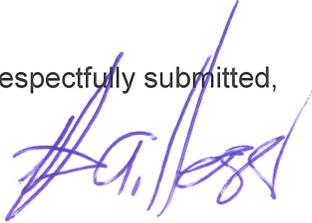
City of Fresno, Comments on Variance Policy, Salinity Variance Program and Salinity Exception Program.

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The City encourages the Regional Board to adopt the amendments to the Basin Plans as they are set forth in the March 2014 Draft Staff Report. We appreciate your consideration of these comments. If you have any questions, please contact Stephen A. Hogg, at (559)621-5100 or [Steve.Hogg@Fresno.gov](mailto:Steve.Hogg@Fresno.gov)

Respectfully submitted,



Stephen A. Hogg  
Assistant Director  
Department of Public Utilities