



April 21, 2014

Via Electronic Mail Only

Ms. Betty Yee
Senior Water Resource Control Engineer
Regional Water Quality Control Board,
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670
betty.yee@waterboards.ca.gov

RE: Comments on Basin Plan Amendments to Add a Variance Policy, Salinity Variance Program, and Salinity Exception Program

Dear Ms. Yee:

The City of Davis (City) appreciates the opportunity to submit comments on the 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* (Basin Plans) to add policies for *Variations from Surface Water Quality Standards for Point Source Dischargers* (Variance Policy), a *Variance Program for Salinity* (Salinity Variance Program), and an *Exception from Implementation of Water Quality Objectives for Salinity* (Salinity Exception Program). The City has provided support for this process and encourages the Central Valley Regional Water Quality Control Board (Regional Board) to adopt the Variance Policy, the Salinity Variance Program, and the Salinity Exception Program.

With respect to the Salinity Variance Program and Salinity Exception Program, the City has worked with the Central Valley Clean Water Association (CVCWA) and the Central Valley Salinity Alternative for Long-Term Sustainability (CV-SALTS), the Regional Board's planning process for salinity and nutrient management and regulation. We are working cooperatively with CV-SALTS as they work to develop a long-term plan that addresses salinity comprehensively. At this time the City is working to reduce salinity through the Woodland Davis Clean Water Agency project in order to meet final salinity effluent limits. However, the water quality objectives upon which the effluent limits are based are likely to be revised as a result of CV-SALTS or the State Water Resources Control Board's review of the salinity standards in the Bay-Delta Plan.

Ms. Betty Yee

Comments on Basin Plan Amendments to Add a Variance Policy, Salinity Variance Program,
and Salinity Exception Program

April 21, 2014

Page 2

The Salinity Variance Program and the Salinity Exception Program provide the Regional Board with a necessary regulatory tool to use in cases where the current objectives require an outcome that is likely to be inconsistent with the future salinity management plan in the Central Valley. The City also believes that the Variance Policy in general helps to provide the Regional Board with an important regulatory tool that does not currently exist in the Basin Plans.

Accordingly, 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, or if the City can be of further assistance, please contact me at (530) 747-8292 or sgryczko@cityofdavis.org.

Sincerely,



Stan Gryczko
WWTP Superintendent, Public Works Department

cc (via email): Pamela Creedon, Central Valley Regional Water Quality Control Board