



CVCWA
Central Valley Clean Water Association
Representing Over Fifty Wastewater Agencies



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February 3, 2012

Charles R. Hoppin, Chair
State Water Resources Control Board
PO Box 100
Sacramento, CA 95812-0100

Via Electronic Mail: commentletters@waterboards.ca.gov

Subject: Comment Letter: A-1886

Dear Chairman Hoppin and Members of the Board:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to provide comments on the proposed amendments to Order WQ 2009-0005, *In the Matter of Own Motion Review of City of Lodi Waste Discharge Requirements And Master Reclamation Permit, Order No. R5-2007-0113* (the Lodi Order.)

CVCWA supports adoption of the proposed amended order. The revisions make clear that facilities used to store treated wastewater and recycled water prior to disposal or reuse are “associated with municipal wastewater treatment” and therefore fall within the unconditional prong of the swage exemption to Title 27. This was an important goal for CVCWA in seeking review of the Lodi Order, and we greatly appreciate the State Water Resources Control Board’s interest in providing this important clarification regarding implementation of Title 27.

Thank you for your consideration of our comments.

Sincerely,

Debbie Webster, Executive Officer

c: Pamela Creedon - Central Valley RWQCB (via E-mail)
Charlie Swimley – City of Lodi