



City of Clovis Public Utilities Department

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January 23, 2008

Mr. Matt Scroggins
Regional Water Quality Control Board
1685 "E" Street
Fresno, CA 93706

Subject: Tentative Waste Discharge Requirements and Master Reclamation Permit
for the City of Clovis Sewage Treatment and Water Reuse Facility

Dear Mr. Scroggins:

On behalf of the City of Clovis ("City"), I would like to thank you for providing us the opportunity to review the tentative Waste Discharge Requirements and Master Reclamation Permit for the City of Clovis Sewage Treatment and Water Reuse Facility ("ST/WRF") ("Tentative Order"). We appreciate all of the time and effort that you and other Central Valley Regional Water Quality Control Board ("Regional Water Board") staff have spent on this Tentative Order. As you know, adoption of this Tentative Order is a high priority for the City and we look forward to its completion.

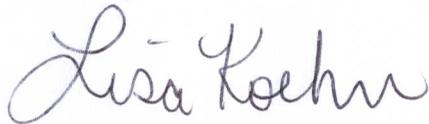
The City has reviewed the Tentative Order and the provisions contained therein. Overall, the City expects to be able to comply with the provisions as proposed and therefore supports adoption of the Tentative Order. However, the City finds it necessary to provide a few comments here on the Tentative Order. First, the City encourages the Regional Water Board staff to revise the Tentative Order to clarify that Fancher Creek is an irrigation canal. Although the Tentative Order alludes to this fact, it is not clearly stated in the Tentative Order. Also, the Tentative Order requires that "[w]astewater shall be oxidized, coagulated, filtered, and adequately disinfected as specified in Title 22, CCR, Division 4, Chapter 3, or the equivalent." (Tentative Order at p. 32.) The treatment system at the ST/WRF will consist of state-of-the-art membrane filtration units that do not include coagulation. Thus, the City considers its treatment process to classify as an "equivalent" level of treatment. The Fact Sheet should be revised to reflect that the treatment process at the ST/WRF will produce a quality of effluent that is consistent with this permit requirement.

Lastly, the Fact Sheet misstates the Regional Water Board's incorporation of the State's Sources of Drinking Water Policy ("Resolution 88-63") as it applies to the Water Quality Control Plan for the Tulare Lake Basin ("Tulare Lake Basin Plan"). The Fact Sheet states, "[b]ased on State Water Board Resolution No. 88-63, the Basin Plans specify that water bodies without beneficial uses listed in the Basin Plans are all designated as having the use of MUN." (Tentative Order at p. F-5.) This statement is partially incorrect as it applies to the Tulare Lake Basin Plan. The language in the Tulare Lake Basin Plan that incorporates Resolution 88-63 is distinctively different from language contained in the Water Quality Control Plan for the Sacramento and San Joaquin River Basins. Most importantly, the Tulare Lake Basin Plan incorporates Resolution 88-63 only for groundwaters. (See Tulare Lake Basin Plan at p. II-2.) It does not include any language that suggests it has been incorporated to also apply to surface waters. Thus, surface waters in the Tulare Lake Basin Plan have not been designated as MUN through Resolution 88-63. To clarify this important distinction, the City recommends that the Fact Sheet be revised as follows:

"Based on State Water Board Resolution No. 88-63, the Sacramento-San Joaquin Rivers Basin Plan ~~Basin Plans specify~~ specifies that water bodies without beneficial uses listed in the ~~Basin Plans~~ Sacramento-San Joaquin Rivers Basin Plan are all designated as having the use of MUN. The Tulare Lake Basin Plan specifies that all groundwater are designated MUN unless specifically exempted."

Notwithstanding the comments and clarifications provided above, the City supports the Tentative Order as proposed and encourages Regional Water Board adoption. If you have any further questions for the City, please do not hesitate to call me at (559) 324-2607.

Sincerely,



Lisa Koehn
Assistant Public Utilities Director

cc: Bert Van Voris, CVRWQCB
Dale Harvey, CVRWQCB