



November 20, 2017

Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

Re: Tentative Order Amending Water Code Section 13301 Order No. R5-2015-0093

Dear Chair Longley and Board Members

The undersigned organizations strongly oppose the tentative order amending Water Code Section 13301 Order No. R5-2015-0093 to grant Valley Water Management Company (VWMC) an 18-month extension beyond the original deadline. The original waste discharge requirement (WDR) requires VWMC to develop and implement alternative disposal methods by January 1, 2018, or to cease discharge at the Race Track Hill and Fee 34 facilities.

In both the original WDR, issued on July 30, 2015, and this tentative order, staff has demonstrated a condition of pollution in the groundwater underlying Race Track Hill. The evidence shows that this facility has been out of compliance for more than 25 years and has a significant impact on groundwater quality. Allowing continued discharge at this site is unacceptable.

The original WDR generously provided VWMC two and one-half years to develop and implement alternative disposal methods, more than enough time. Moreover, the January 1, 2018 deadline provided much more time than Regional Board staff recommendations. Proving the validity of the staff's timeframe perspectives, the tentative order says "many current and former VWMC members have pursued alternative disposal options and no longer utilize the Fee 34 and

Race Track Hill facility." This demonstrates that the January 1, 2018 deadline was more than adequate and is a strong reason not to grant an additional 18-month extension. The extension request is merely a delay tactic to allow continued disposal and groundwater pollution.

There is no environmental or public health justification for granting an additional 18-month extension. We urge the regional board to deny this request.

Sincerely,

Keith Nakatani
Clean Water Action

Nayamin Martinez
Central California Environmental Justice
Network

Tom Frantz
Association of Irrigated Residents

Bill Allayaud
Environmental Working Group

Alvaro Casanova
Center for Environmental Health

Bruce Baizel
Earthworks

Paul Ferrazzi
Citizens Coalition for a Safer Community

Tanja Srebotnjak
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