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For Petitioner California Sportfishing Protection Alliance

**BEFORE THE OFFICE OF ADMINISTRATIVE LAW**

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**In the Matter of Improper Underground )  
Regulation; Guidance for Salinity in Waste )  
Discharge Requirements; California Regional )  
Water Quality Control Board – Central Valley )  
Region )  
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**PETITION FOR REVIEW**

Pursuant to Section 11340.5 of California Government Code and Title 1 Section 260 of the California Code of Regulations, the California Sportfishing Protection Alliance (“CSPA” or “petitioner”) petitions the Office of Administrative Law to review the underground regulations employed by the California Regional Water Quality Control Board for the Central Valley Region (“Regional Board”), as outlined in the Management Guidance for Salinity in Waste Discharge

Requirements (Memorandum). The Regional Board has used the Memorandum in preparing and adopting Waste Discharge Requirements for numerous wastewater dischargers. CSPA requests the Office of Administrative Law to accept the petition and issue a determination, pursuant to Section 270 of the California Code of Regulations that the Regional Board's policy for control of salinity is an illegal underground regulation.

**1. Petitioner's Identifying Information:**

California Sportsfishing Protection Alliance  
3536 Rainier Avenue, Stockton, CA., 95204  
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**2. State agency or department being challenged:**

California Regional Water Quality Control Board, Central Valley Region

**3. Description of the purported underground regulation.**

Memorandum from the Executive Management Group of the California Regional Water Quality Control Board, Central Valley Region (Regional Board), to Program Managers with the subject "Management Guidance for Salinity in Waste Discharge Requirements," dated April 26, 2007.

**4. Description of the agency actions you believe demonstrate that it has issued, used, enforced, or attempted to enforce the purported underground regulation.**

Since the Regional Board's Executive Management Group issued the Memorandum, the Regional Board has adopted numerous permits regulating waste discharges to surface waters and ground waters (formally known as Waste Discharge Requirement Orders or WDRs Orders) and enforcement actions that address salinity based upon direction provided within the Memorandum. The Memorandum has the affect of generally authorizing degradation and ultimately pollution of state and federal waters for salinity based pollutants<sup>1</sup>. Establishing discharge limitations, prohibitions, clean-up levels, and other regulatory requirements necessary to implement, interpret or otherwise apply the law must be based upon requirements in law, not

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<sup>1</sup> "Salinity" can and is measured in several manners. Most common is the use of "electrical conductivity" or "EC" and "total dissolved solids" or "TDS". EC is a measure of the ability of a solution to conduct an electrical charge; the greater the ability to conduct, the more 'salinity' in the solution. The most common, and regulatory standard, unit of measure for EC is "micromhos per centimeter" ( $\mu\text{mhos/cm}$ ). TDS is a measure of the concentration of dissolved solids (i.e., "salts) in solution, usually reported as mg/L or parts per million (ppm).

In some situations it is possible to develop a reliable empirical correlation between EC and TDS, but not always.

the Memorandum. While the Regional Board has been careful to not overtly cite the Memorandum in its decisions and actions, it is clear that actions of the Regional Board incorporate language and theory from the Memorandum.

Additionally, in other forums not necessarily part of the administrative record for any particular Regional Board action, Executive Management, Regional Board staff, and members of the regulated community have made reference to the Memorandum as the new regulatory approach with respect to salinity in the Central Valley.

*While the plans are being formulated, the Board continues to address salinity through traditional means: waste discharge requirements, permits, conditional waivers and enforcement orders. In April 2007, Regional Board management issued a guidance memo on implementing measures to address salinity through those traditional means.*

*Since the spring of 2007, more than 30 orders have included effluent, receiving, and/or groundwater limits for salt; at least 25 orders have required salt evaluation and minimization plans; and at least 15 orders called for groundwater monitoring to track salinity changes and/or groundwater assessment studies. These were primarily for industrial facilities or municipal wastewater plants. Staff has prepared a preliminary list of orders containing salt-related requirements that have been prepared since issuance of the Salinity Guidance Memo. [October 2008 meeting of the Regional Board sponsored “Central Valley Salinity Policy Group” meeting; handout prepared by Regional Board staff]*

([http://www.swrcb.ca.gov/rwqcb5/water\\_issues/salinity/policy\\_group/plcy\\_grp\\_salt\\_mgt\\_activities.pdf](http://www.swrcb.ca.gov/rwqcb5/water_issues/salinity/policy_group/plcy_grp_salt_mgt_activities.pdf))

*This is a partial list of Regional Board orders that contain salt requirements prepared since issuance of the Salinity Guidance Memorandum in May 2007. It was compiled for the purpose of reporting to the Salinity Policy Group at their October 30, 2008 meeting. It is not a complete list, nor has it been thoroughly reviewed by Regional Board staff to ensure complete accuracy. [October 2008 meeting of the Regional Board sponsored “Central Valley Salinity Policy Group” meeting; attachment to handout prepared by Regional Board staff]*

([http://www.swrcb.ca.gov/rwqcb5/water\\_issues/salinity/programs\\_policies\\_reports/rb\\_salt\\_related\\_orders.pdf](http://www.swrcb.ca.gov/rwqcb5/water_issues/salinity/programs_policies_reports/rb_salt_related_orders.pdf))

*“Salinity and the Water Board – The regulatory approach to addressing salinity through new and existing permits” presentations by Pamela Creedon, Executive Officer of the CVRWQCB, and Ken Landau, Assistant Executive Officer of the Central Valley Regional Water Quality Control Board on the recently issued Salinity Guidance memo issued by*

*the Regional Board's Executive Management Group.* [Item on a draft agenda for June 28, 2007 meeting of the Central Valley Salinity Policy Group Steering Committee] ([http://www.swrcb.ca.gov/rwqcb5/water\\_issues/salinity/committees/exec\\_committee/sc-28jun07-ag.pdf](http://www.swrcb.ca.gov/rwqcb5/water_issues/salinity/committees/exec_committee/sc-28jun07-ag.pdf))

*Upcoming events to be discussed in the next LDG meeting (July 17, Fresno) will be an overview of Pamela Creedon's presentation on "Salinity and the Water Board – The regulatory approach to addressing salinity through new and existing permits" on the recently issued Salinity Guidance memo from the Regional Board's Executive Management Group.* [July 2007 issue of "Clean Water News" published by the Central Valley Clean Water Association. CVCWA represents wastewater agencies in the Central Valley] ([http://www.cvcwa.org/pdf%20files/Newsletters/Newsletter\\_V1\\_I3.pdf](http://www.cvcwa.org/pdf%20files/Newsletters/Newsletter_V1_I3.pdf))

The following are a few examples of how the Regional Board has applied the "Management Guidance for Salinity in Waste Discharge Requirements."

**CASE 1: Mozerella Fresca, Inc., Tipton Cheese Processing Plant, Tulare County; WDRs Order No. R5-2007-0122, adopted on September 14, 2007**

Discharge salinity (finding No. 12):

Average EC = 1,400  $\mu$ mhos/cm  
Average TDS = 1,200 mg/L

Source Water (finding No. 27):

EC = 212  $\mu$ mhos/cm  
TDS = 140 mg/L

Water Quality Objective (finding No. 35 a and b):

EC = The maximum EC shall not exceed the EC of the source water plus 500  $\mu$ mhos/cm up to a maximum of 1,000  $\mu$ mhos/cm

Effluent Limitation (B.2):

EC = 1600  $\mu$ mhos/cm  
TDS = none

**Discussion:** An effluent limit of 1600  $\mu\text{mhos/cm}$  for this discharge, represents a “performance based” limit since it essentially reflects the maximum salinity discharged (i.e., it matches the salinity “performance” of the facility). The Memorandum instructs staff to “Prescribe an interim effluent limit that caps the current effluent salinity” (page 7).

The *Porter-Cologne Water Quality Control Act* requires effluent limitations necessary to protect beneficial uses to be protected and water quality objectives required for that purpose<sup>2</sup>. In this case, the Tulare Lake Basin Plan<sup>3</sup> establishes a numerical water quality objective for EC of a maximum incremental increase of 500  $\mu\text{mhos/cm}$  over source water supply up to a maximum 1,000  $\mu\text{mhos/cm}$  (the basis for Finding No. 35).

[http://www.swrcb.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/tulare/r5-2007-0122.pdf](http://www.swrcb.ca.gov/centralvalley/board_decisions/adopted_orders/tulare/r5-2007-0122.pdf)

**CASE 2: City of San Joaquin Wastewater Treatment Facility, Fresno County; WDRs Order No. R5-2007-0100, adopted on August 2, 2007**

Discharge salinity (finding No. 12):

Average EC = 1,380  $\mu\text{mhos/cm}$   
Average TDS = not available.

Source Water (finding No. 31):

EC = 530  $\mu\text{mhos/cm}$   
TDS = 275 mg/L

Water Quality Objective (finding No. 38 a and b):

EC = The maximum EC shall not exceed the EC of the source water plus 500  $\mu\text{mhos/cm}$  up to a maximum of 1,000  $\mu\text{mhos/cm}$

Effluent Limitation (B.5):

EC = 1500  $\mu\text{mhos/cm}$  (interim annual average)  
TDS = none

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<sup>2</sup> California Water Code sections 13241, 13263

<sup>3</sup> [http://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/index.shtml)

**Discussion:** An effluent limit of 1500 mmhos/cm for this discharge, represents a “performance based” limit since it essentially reflects the maximum salinity discharged (i.e., it matches the salinity “performance” of the facility). The Memorandum instructs staff to:

*“Prescribe an interim effluent limit that caps the current effluent salinity”* (page 7).

The Memorandum further states:

*“if sufficient information does not exist to prescribe any of the effluent limitations discussed above, or if the discharger cannot immediately comply with a prescribed effluent limit for EC and/or TDS, a interim effluent limits and a time schedule (as appropriate) can be prescribed”* (page 5).

*“This document provides guidance to staff for developing individual WDRs/Permits where salinity issues have not previously been addressed to be consistent with the Basin Plans and applicable laws and policies of the Regional Board”* (Page 1).

The *Porter-Cologne Water Quality Control Act* requires effluent limitations necessary to protect beneficial uses to be protected and water quality objectives required for that purpose<sup>4</sup>. In this case, the Tulare Lake Basin Plan establishes a numerical water quality criteria for EC of a maximum incremental increase of 500  $\mu\text{mhos/cm}$  over source water supply up to a maximum 1,000  $\mu\text{mhos/cm}$  (the basis for Finding No. 38).

In the Information Sheet of WDRs Order No. R5-2007-0100 (page 5) there is an apparent reference to the Memorandum (referring to it as “policy”).

*“The proposed Order would establish an effluent limitation for EC that reflects the Regional Water Board policy for managing the salts within the Tulare Lake Basin. The City is unable to immediately comply with the effluent limitations set forth in the Basin Plan (an effluent EC of 1,000  $\mu\text{mhos/cm}$  or 500  $\mu\text{mhos/cm}$  over source water), as the WDRs Order No. 2002-0103 did not establish an effluent limitation for EC. In the interim, the proposed WDRs would establish an EC effluent limitation of 1,500  $\mu\text{mhos/cm}$ , which reflects the current discharge quality (based on the 2006 influent EC values). This performance-based limit will be re-opened upon completion of the provisions required by this proposed order.”* Emphasis added.

[http://www.swrcb.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/fresno/r5-2007-0100.pdf](http://www.swrcb.ca.gov/centralvalley/board_decisions/adopted_orders/fresno/r5-2007-0100.pdf)

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<sup>4</sup> California Water Code sections 13241, 13263

**Case 3: City of Tracy Wastewater Treatment Plant, NPDES Permit R5-2007-0036 adopted in 2007**

**Discussion:** For wastewater discharges to surface waters Federal Regulations, 40 CFR 122.44(d), requires that effluent Limitations must be included in permits where pollutants will cause, have reasonable potential to cause, or contribute to an exceedance of the State's water quality standards. US EPA has interpreted 40 CFR 122.44(d) in Central Tenets of the National Pollutant Discharge Elimination System (NPDES) Permitting Program (Factsheets and Outreach Materials, 08/16/2002) that although States will likely have unique implementation policies there are certain tenets that may not be waived by State procedures. These tenets include that "where calculations indicate reasonable potential, a specific numeric limit MUST be included in the permit. Additional "studies" or data collection efforts may not be substituted for enforceable permit limits where "reasonable potential" has been determined."

Implementation of the recommendations of the Memorandum omits Effluent Limitations contrary to Federal Regulation. This is the case for the City of Tracy's wastewater treatment plant. A review of the Discharger's monitoring reports from July 1998 through December 2004 shows an average effluent EC of 1753  $\mu\text{mhos/cm}$ , with a range from 1008  $\mu\text{mhos/cm}$  to 2410  $\mu\text{mhos/cm}$  for 305 samples. The Water Quality Control Plan for the San Francisco/Sacramento-San Joaquin Delta Estuary contains site-specific water quality objectives for electrical conductivity for the South Delta established by the State Water Resources Control Board.<sup>5</sup> The water quality objectives have been established at 700  $\mu\text{mhos/cm}$  (from 1 April to 31 August) and 1000  $\mu\text{mhos/cm}$  (from 1 September 1 to 31 March) based on a 30-day running average for protection of agricultural beneficial uses. The Regional Board found that the discharge presented a reasonable potential to exceed the water quality standards for electrical conductivity.

However, Effluent Limitation No. 1(i) states that: "*The EC in the discharge shall not exceed a monthly average of 700 umhos/cm (April 1 to August 31) and a monthly average of 1,000 umhos/cm (September 1 to March 31), unless:*

- 1. The Discharger implements all reasonable steps as agreed by the Executive Officer to obtain alternative, lower salinity water supply sources; and*
- 2. The Discharger develops and implements a salinity source control program as approved by the Executive Officer that will identify and implement measures to reduce salinity in discharges from residential, commercial, industrial and infiltration sources in an effort to meet the interim salinity goal of a maximum 500 umhos/cm electrical conductivity increase over the weighted average electrical conductivity of the City of Tracy's water supply: and*

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<sup>5</sup> [http://www.waterrights.ca.gov/baydelta/docs/2006\\_plan\\_final.pdf](http://www.waterrights.ca.gov/baydelta/docs/2006_plan_final.pdf)

3. *When notified by the Executive Officer, the Discharger participates financially in the development of the Central Valley Salinity Management Plan.*

*Failure to meet conditions 1) through 3), above, shall result in the final effluent limitation becoming effective.”*

The Effluent Limitations 1(i) for electrical conductivity in the Tracy NPDES Permit were suspended provided that the Discharger conducts the appropriate studies and participates financially in the development of the Regional Board’s salt management plan. Unfortunately, this underground policy fails to comport with state and federal regulations.

[http://www.swrcb.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/san\\_joaquin/r5-2007-0036.pdf](http://www.swrcb.ca.gov/centralvalley/board_decisions/adopted_orders/san_joaquin/r5-2007-0036.pdf)

**Case 4: University of California, Davis Campus Wastewater Treatment Plant, NPDES Permit R5-2008-0183 adopted in December 2008**

**Discussion:** The NPDES permit for the University of California at Davis Campus Wastewater Treatment Plant wastewater discharge is similar to the Tracy Permit. The permit states, in Finding No. R, that:

*“Salinity Limitations. This Order contains interim effluent limitations for Electrical Conductivity (EC) that are to remain in effect for the term of the Order. This Order requires the Discharger to study appropriate EC levels to protect agricultural beneficial use in areas irrigated with water from the Putah Creek diverted downstream from the discharges. A final EC effluent limitation will be included in the subsequent renewal of this Order when site-specific water quality and agriculture-related information is available.”*

The wastewater EC discharge monthly average is 1,091 umhos/cm with a maximum measured value of 1,679 umhos/cm. This level exceeds the EC concentration the California Department of Fish and Game considers necessary to support a good mix of aquatic life and approaches the upper tolerance limit for fish. EC clearly threatens to degrade the aquatic life beneficial use of Putah Creek and exceeds the applicable water quality standards and objectives. The requirement to conduct additional studies was included in the permit despite the fact that the University had already submitted exhaustive studies regarding salinity and expressly contrary to the above-cited regulation and EPA’s interpretation. Failure to include protective Effluent Limitations fails to protect the beneficial uses of the receiving waters.

[http://www.swrcb.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/solano/r5-2008-0183.pdf](http://www.swrcb.ca.gov/centralvalley/board_decisions/adopted_orders/solano/r5-2008-0183.pdf)



**5. The legal basis for believing that the guideline, criterion, bulletin, provision in a manual, instruction, order, standard of general application, or other rule or procedure is a regulation as defined in Section 11342.600 of the Government Code AND that no express statutory exemption to the requirements of the APA is applicable.**

The Memorandum makes the following declarations regarding how discharge permits and enforcement actions should be developed and implemented:

- “guidance to staff for developing individual WDRs/Permits” (page 1);
- “corrective action may be influenced by this guidance” (page 2);
- “The following is guidance for implementation of current Basin Plan and other policies relevant to salinity...” (page 4); and
- “The following guidance is provided for implementing existing policy and regulation to increase consistency and reasonableness of WDRs and NPDES relative to salinity control” (page 5).

The title of the flow chart intended to show a general approach to conducting studies and developing salinity-related limitations is “*General Guidance to Establish Salinity Limitations in Waste Discharge Requirements and NPDES Permits under Existing Salinity Policies.*”

The California Regional Water Board, Central Valley Region is not exempt from the requirements of the Administrative Procedures Act when adopting regulations, policy and other non quasi-judicial decisions. The Memorandum was not adopted pursuant to legally mandated rule-making procedures. Application of the Memorandum has resulted in the degradation of the state’s surface and ground waters.

**6. Information demonstrating that the petition raises an issue of considerable public importance requiring prompt resolution.**

California’s surface and ground waters are identified as severely degraded and incapable of supporting identified beneficial uses because of excessive salt (EC) discharge and accumulation.<sup>6</sup> The Regional Board’s underground regulation/policy for addressing waste discharges of salt ignores legally promulgated state and federal regulations and illegally extends the timeframe for controlling discharges of salts thereby ensuring that degradation of surface and

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<sup>6</sup> See: [http://www.waterboards.ca.gov/water\\_issues/programs/tmdl/303d\\_lists2006.shtml](http://www.waterboards.ca.gov/water_issues/programs/tmdl/303d_lists2006.shtml) and [http://www.waterboards.ca.gov/centralvalley/water\\_issues/salinity/initial\\_development/swrcb-02may06-ovrvw-rpt.pdf](http://www.waterboards.ca.gov/centralvalley/water_issues/salinity/initial_development/swrcb-02may06-ovrvw-rpt.pdf) and [http://www.waterboards.ca.gov/centralvalley/water\\_issues/salinity/programs\\_policies\\_reports/econ\\_rpt\\_final.pdf](http://www.waterboards.ca.gov/centralvalley/water_issues/salinity/programs_policies_reports/econ_rpt_final.pdf)

ground waters will continue to occur and even increase. Petitioner believes this to be an issue of considerable public importance.

By definition<sup>7</sup>, discharges to waters of the state that exceed the water quality objective developed for the purpose of protecting the defined beneficial uses result in pollution. For example, in Case 1 (Mozerella Fresca, Inc., Tipton Cheese Processing Plant, Tulare County), the average EC of groundwater in the area of the discharge ranges from 351 to 445 mmhos/cm (finding No. 29). Since salinity is considered to be “conservative” (e.g., it is not removed by plants or otherwise ‘treated’ in soil) all excess EC will eventually be in the groundwater. The authorized discharge of 1600 mmhos/cm essentially represents pollution sixty percent greater than maximum allowed by law (1000 mmhos/cm). It is inevitable that the currently unpolluted groundwater will be polluted for EC. Beneficial uses identified for the groundwater include municipal, agricultural, industrial, and wildlife habitat. In effect, existing policy (i.e., the Water Quality Control Plans) states that people will likely be drinking or attempting to irrigate agricultural land. The WDRs Order, with limitations adopted pursuant to guidance in the Memorandum, ensures that those activities will ultimately occur with polluted water.

This is a pattern occurring across the Central Valley following the introduction of the Memorandum. Based on guidance contained in the Memorandum, the Regional Board is allowing high quality water to be or become polluted and allowing polluters to continue polluting to the detriment of public health, the environment and the livelihoods of those who depend upon unpolluted water representing a matter of considerable public importance requiring prompt attention.

Many of the cited wastewater and sewage discharges where groundwater has been “polluted” would be required to comply with strict prescriptive standards to control their waste in accordance with California Code of Regulations Title 27. Discharges of wastewater may be exempted from CCR Title 27 requirements (§20090. SWRCB – Exemptions, (C15: §2511)) only if: waste discharge requirements have been issued; the discharge is in compliance with the applicable Basin Plan, and; the wastewater is not hazardous (Section 20090). The Water Quality Control Plan for the Tulare Lakes Basin contains water quality objectives for groundwater. The Basin Plan *Water Quality Objectives for Groundwater* requires groundwater not exceed: 2.2 MPN/100 ml for coliform organisms; the maximum contaminant levels (MCLs) from CCR Title 22 for drinking water; taste or odor producing substances that cause nuisance or adversely affect beneficial uses, and; toxic substances that produce detrimental physiological responses in human, plant, animal or aquatic life associated with designated beneficial uses. The Basin Plan also includes the State and Regional Board Antidegradation Policy (Resolution 68-16). The Antidegradation Policy requires the maintenance of high quality waters. In accordance with the

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<sup>7</sup> CWC sections 13050 and 13241

Antidegradation Policy changes in water quality are allowed only if the change is consistent with maximum benefit to the people of the state; does not unreasonable affect present and anticipated beneficial uses; does not result in water quality that exceeds water quality objectives, and; best practicable treatment and control of the discharge is provided. The Memorandum does not once mention CCR Title 27 and attempts to negate the regulatory requirements of the regulation.

The situation is similar for discharges of wastewater to surface waters that require an NPDES permit pursuant to the federal Clean Water Act. For example, in Case 3 (City of Tracy Wastewater Treatment Plant), the EC of ambient or receiving waters was identified as averaging 640 umhos/cm while the average of the effluent averaged 1,753 umhos/cm. Despite clear “reasonable potential” to exceed the water quality standard, no final limit was included in the permit. The Regional Board is routinely allowing wastewater discharges containing EC levels far above Basin Plan requirements and where no assimilative capacity for continued or increased salt loading exists.

The Regional Board has routinely cited the Tulare Lake Basin Plan (*an effluent EC of 1,000  $\mu$ mhos/cm or 500  $\mu$ mhos/cm over source water*) in NPDES Permits located under the jurisdiction of the Sacramento/San-Joaquin Basin Plan. The Sacramento/San-Joaquin Basin Plan contains no such salinity objective. This improper use of the Tulare Lake Basin Plan can allow an exceedance of water quality standards and objectives included in the Sacramento/San-Joaquin Basin Plan. The Regional Board cites that “best practicable treatment and control” (BPTC) is established by the Tulare Lake Basin Plan. Application of the Tulare Lake Basin Plan water quality objective for EC in the Sacramento/San-Joaquin Basin, without going through the official rule making process would also appear to be application of an underground regulation.

It should also be noted that the Regional Board’s underground regulation allows up to twenty years for compliance with salinity limitations despite explicit Basin Plan requirements to the contrary. The Water Quality Control Plan for the Sacramento River and San Joaquin River Basins, page IV-17.00, allows the Regional Board to establish compliance schedules if water quality objectives cannot be immediately achieved. The Basin Plan requires that time schedules be included for completion of specific actions that demonstrate reasonable progress toward the attainment of objectives or criteria. Compliance schedules are required by the Basin Plan to be as short as practicable to achieve compliance and in no event may a schedule exceed ten years. The Regional Board’s underground Memorandum allows schedules of compliance that far exceed those permitted by the Basin Plan and ignores the requirement that schedules be as short as practicable. Emphasis added.

**7. Additional relevant information that will assist OAL in evaluating your petition.**

Petitioner has described the technical and legal issues involved in this petition as succinctly as possible. If you have any questions, please don't hesitate to contact us. For technical matters, we suggest you contact Richard McHenry at 916-851-1500. Mr. McHenry was a long-time supervising engineer with the Regional Board in charge of developing NPDES permits for the Sacramento Valley.

**8. Certifications:**

I certify that I have submitted a copy of this petition and all attachments to the state agency which has issued, used, enforced, or attempted to enforce the purported underground regulation:

Name of person in agency to whom petition was sent:

Ms. Pamela Creedon, Executive Officer  
California Regional Water Quality Control Board, Central Valley Region  
11020 Sun Center Drive #200  
Rancho Cordova, CA 95670-6114  
(916) 464-4839.

If you have any questions regarding this petition, please contact Bill Jennings at (209) 464-5067 or Andrew Packard at 707-763-7227.

I certify that all of the above information is true and correct to the best of my knowledge.

Dated: 26 May 2009



Bill Jennings, Executive Director  
California Sportfishing Protection Alliance

Attachment: Management Guidance for Salinity in Waste Discharge Requirements