Subject: Public Comment on the Draft Bay Delta Conservation Plan

The City of Lodi appreciates the opportunity to provide comments on the Bay Delta Conservation Plan (BCDP), which includes the December 13, 2013 Draft BDCP, the BDCP Environmental Impact Report (EIR) and Environmental Impact Statement (EIS). The City would like to express its concerns regarding the BDCP and related documents and its effect on the Sacramento-San Joaquin Delta.

The City of Lodi is located in San Joaquin County and borders the Mokelumne River to the north, and is subject to the storm water general permit for municipal separate storm sewer system (MS4), National Pollutant Discharge Elimination System permit (NPDES) Number CAS000004, Order 2013-0001-DWQ. The City’s White Slough Water Pollution Control Facility (a Publicly Owned Treatment Works), which is located within the boundary of the BDCP, is located adjacent to the White Slough Wildlife Area and discharges tertiary treated effluent to Dredger Cut near the confluence of White Slough and Bishop Cut in compliance with NPDES permit Number CA0079243, Order R5-2007-0113-01.

The City of Lodi supports comments sent separately by the Central Valley Clean Water Association (CVCWA), the San Joaquin County Board of Supervisors, as well as the Sacramento Storm Water Quality Partnership. Additionally, the City also is concerned that the BDCP does not sufficiently address potential impacts (regulatory, fiscally, etc.) to municipalities and POTWs that are subject to NPDES permits. The City further requests that these impacts, as well as those described in the comments supported be evaluated.

Sincerely,

F. Wally Sandelin
Public Works Director

FWS/kgm

Cc: Debbie Webster, Executive Officer, CVCWA
    Gerardo Dominguez, San Joaquin County Public Works
    Brian Laurensen, Larry Walker Associates
    Steve Schwabauer, City Manager
    Kathryn Garcia, Compliance Engineer