The Board now does not just endorse experts at the expense of other users of Delta.

Introduction.

SWRCB's Draft Order Denying Petitions for Reconsideration.

The South Delta Water Agency ("SDWA") submits the following comments to the Board:

January 29, 2009

Via E-Mail COMMUNICATIONS@waterboards.ca.gov

January 29, 2009

Mary Hildeman
Deborah Mears
Renee K. Krasnoff, Acting Chairman
OFFICE OF THE CHAIRMAN

RE: SDWA Petitions for Reconsideration Draft Order

SUNSET HOUSE
1001 T Street, 24th Floor
Sacramento, CA 95814-2828

January 29, 2009

Re: SDWA Petitions for Reconsideration Draft Order,

Dear Ms. Townsend,

SWRCB’s Draft Order Denying Petitions for Reconsideration.

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RE: SDWA Petitions for Reconsideration Draft Order

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1001 T Street, 24th Floor
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January 29, 2009

Re: SDWA Petitions for Reconsideration Draft Order,
Although the Lerberg Petition was handled in a timely manner, one might say an expedited process would have been better. The decision to recognize the requesting party's interest is a crucial step in the process. The Board's decision to recognize the requesting party's interest is a significant step in the process.

Regarding the petition, the Board was asked to reconsider its decision. This request was made within 90 days of the Board's decision. The Board is required to consider the petition and make a decision within 120 days of the request.

First, the Board must decide if the issues are moot. If they are, the Board will dismiss the petition. If they are not, the Board will consider the issues.

Mooreness's objections, the Board must address.

The Board must address the petition and make a decision. If the Board does not act within 120 days, the petition will be considered moot.

One can only speculate as to why the Board did not act within the stipulated period. Perhaps the Board was stymied by the complexity of the issues or the difficulty in finding a solution. Whatever the reason, the Board must address the petition and make a decision.

January 29, 2009

Mrs. Leanne Townsend, Chair to the Board
do nothing, wait until the last minute and then get an expedited change without having shown it

The Board comprises the chief executive officer, the president, and any other officers of the corporation. The president may fix the time and place of meetings and may call special meetings of the Board. The Board may adopt rules for governing its own proceedings in meetings. The Board may authorize its officers to sign such agreements or instruments as may be necessary to carry out the provisions of this act.

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through an efficiency petition.

To seek a change in the permit's terms, petitioners can file a petition that is not an efficiency petition. However, if a permit is not amended to allow the petitioner's full request, the petitioner may file an efficiency petition. This petition will be heard by the SWRCB.

In summary, efficiency petitions are filed to allow changes in the terms of a permit. They are not used when the terms of a permit are not amended. The SWRCB will hear the efficiency petition and make a decision.

The Board, in its discretion, has the authority to approve or deny the Governor's declaration of emergency.

The Board also has the authority to modify the permit's terms.

This is similar to what is done with other permits. The Board has the authority to change the terms of a permit. It must do so in a reasonable manner and not in a way that would harm the public interest.

The Board's decision is final and cannot be appealed.

In conclusion, the Board has the authority to modify the permit's terms. It must do so in a reasonable manner and not in a way that would harm the public interest.

The Board's decision is final and cannot be appealed.

This case is the perfect example of how the Board can modify a permit's terms.
Besides the summer violations, DPR and USBR notified the Board that violations have occurred in December of 2008. At this time SDWA is not aware that these violations have ceased.

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Order

Job.

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The job, as defined by the regulators, is to support the enforcement of water quality standards. The Water Quality enforcement program is therefore one of the most important programs in the State Department of Environmental Protection. The enforcement program is responsible for the enforcement of water quality standards and no one else. The job could be done by anyone, and the SDWA has assigned the enforcement of the standards to the Board. The job is to enforce the standards, and no one else.

The Board is responsible for the enforcement of water quality standards. The SDWA has assigned the enforcement of water quality standards to the Board. The Board is responsible for the enforcement of water quality standards in the State Department of Environmental Protection.
Please call me if you have any questions or comments.

The permit conditions and comments that JPOD can only occur during such times of compliance.

was unapproved by the Task and Committee to law, having that DWR and USBR must meet all of

SDWA requires the SWRCB disregard the Draft Order acknowledge that the original Order

Reconsideration:

SDWA’s previous comments adequately address the other issues raised in its Request for

USBRS meet the objectives whenever they conduct JPOD operations.

Since no environmental document that analyzes the effects of Condition 1 of the WSCP

violated) would require compliance with the California Environmental Quality Act...

However, a permit change allowing JPOD when water quality standards are below

With regard to the necessity of CEQA, SDWA refers the Board to page 26 of the CDO

Page 6

January 29, 2009

Ms. Jennifer Townsend, Clerk to the Board