

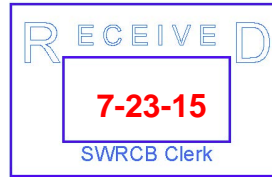


CALIFORNIA ASSOCIATION of SANITATION AGENCIES

1225 8th Street, Suite 595 • Sacramento, CA 95814 • TEL: (916) 446-0388 • www.casaweb.org

July 23, 2015

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Via Electronic Mail

Re: Comment Letter – Proposal to Develop a Storm Water Program Workplan and Implementation Strategy

Dear Ms. Townsend:

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to submit comments on the Proposal to Develop a Storm Water Program Workplan and Implementation Strategy. CASA is a statewide association of municipalities, special districts, and joint powers agencies that represent more than ninety percent (90%) of the sewered population of California. CASA has long been a proactive leader on wastewater treatment, recycled water, air quality, biosolids management, renewable energy, and climate change mitigation issues.

Many wastewater treatment plants are willing to accept dry weather urban runoff and first flush stormwater, which can ultimately enhance beneficial use protection and augment recycled water opportunities but may introduce an additional unpredictable variable that may affect influent water quality.

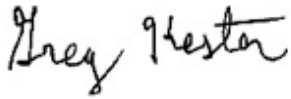
CASA agrees that there is an urgent need to take bigger strides in protecting water quality from storm water impacts with the severe impacts of drought and climate change on California water resources. The Proposal is a thorough, well-documented development of guiding principles and projects the Water Boards can implement to evolve the Storm Water Program. Furthermore, CASA fully supports the Proposal's focus on water capture and reuse and watershed-based compliance. We offer the following recommendations in terms of prioritizing two specific projects over others.

The projects entitled "Urban Pesticide Reduction" and "True Source Control and Pollution Prevention" should be upgraded to the highest priority possible, due to their importance in leading to actual improvements in water quality. CASA strongly recommends that the Water Boards work with the California Department of Pesticide Regulation (CDPR) and the USEPA Office of Pesticide Programs (OPP) to ensure that pesticides are adequately regulated. It is the responsibility of CDPR, in conjunction with OPP, to ensure that water quality is not adversely impacted by pesticide use. To this end, CDPR and USEPA have direct authority to regulate pesticide manufacturers and restrict pesticide products available for use. These authorities do not extend to the Water Boards or public agencies, including POTWs. Therefore, the burden of resolving pesticide issues in water bodies should not be transferred to POTWs or storm water discharges, as local jurisdictions are not allowed to restrict or ban pesticide usage. The Water Boards should support efforts to ensure that federal and state pesticide regulatory programs are better aligned with water quality regulatory programs.

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Please feel free to contact me at gkester@casaweb.org or at 916-844-5262 with any questions or for further clarification.

Sincerely,

A handwritten signature in black ink that reads "Greg Kester". The signature is written in a cursive style with a large initial "G".

Greg Kester
Director of Renewable Resource Programs