



# CVCWA

## Central Valley Clean Water Association

*Representing Over Fifty Wastewater Agencies*

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**TERRIE MITCHELL** – Vice Chair, Sacramento Regional CSD  
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*Submitted Via Electronic Mail*

March 10, 2014

Mr. Robert Schlipf  
San Francisco Bay Regional Water Quality Control Board  
1515 Clay Street, Suite 1400  
Oakland, CA 94612  
[robert.schlipf@waterboards.ca.gov](mailto:robert.schlipf@waterboards.ca.gov)

**Subject: Comments on Tentative Order for Municipal Wastewater Discharges of Nutrients to San Francisco Bay, NPDES Permit**

Dear Mr. Schlipf:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to submit comments on the Tentative Order for Municipal Wastewater Discharges of Nutrients to San Francisco Bay, NPDES Permit. CVCWA is a non-profit association of public agencies located within the Central Valley region that provide wastewater collection, treatment and water recycling services to millions of Central Valley residents and businesses. We approach these matters with the perspective of balancing environmental and economic interests consistent with state and federal law. In this spirit, we provide the following comments regarding the Tentative Order's and its role in the larger Nutrient Management Strategy for the San Francisco Bay.

As the Central Valley Regional Water Board and the State Water Resources Control Board are just beginning efforts to establish Nutrient Objectives for the Delta, CVCWA has been following your collaborative activities in the San Francisco Bay area to address this complicated scientific and regulatory issue. Clearly there is a nexus between the Bay and the Delta with regard to nutrient loadings, impacts and management. CVCWA appreciates that the San Francisco Bay Nutrient Strategy and the proposed Tentative Order have been developed based on robust stakeholder involvement and are grounded in the idea of developing the information

and tools that will lead to sound management and regulatory decisions. In addition, CVCWA appreciates that the Tentative Order recognizes the need for adequate time and resources to create a credible scientific foundation for future decision-making.

With this in mind, CVCWA requests that the San Francisco Bay Regional Water Quality Control Board (Water Board) consider the following comment on the Tentative Order.

**1. Future regulatory action should be tied to the results of the scientific studies and approach outlined in the Nutrient Management Strategy**

The Tentative Order describes the San Francisco Bay Regional Water Board's plan to consider increased regulatory requirements in future permit cycles. CVCWA requests that language be added to the Tentative Order to clearly state such regulatory requirements shall be based on the scientific results derived from the completion of the approach described in the Nutrient Management Strategy. Those scientific underpinnings are essential to ensure that resources are expended effectively on nutrient management measures that achieve desired environmental outcomes and beneficial use protection.

We appreciate your consideration of our comments. If you have any questions or CVCWA can be of further assistance, please contact me at (530) 268-1338 or [eoofficer@cvcwa.org](mailto:eoofficer@cvcwa.org).

Sincerely,



Debbie Webster,  
Executive Officer – CVCWA

c: Pamela Creedon – Central Valley Regional Water Board  
Dave Williams - BACWA