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May 17, 2012

Naomi Feger
San Francisco Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Sent via email to: nfeger@waterboards.ca.gov

Draft San Francisco Bay Nutrient Strategy – CCCSD's Comments

Dear Ms. Feger:

Central Contra Costa Sanitary District (CCCSD) appreciates the opportunity to provide comments on the March 2012 draft of the Nutrient Strategy for San Francisco Bay. CCCSD supports the very thorough comments submitted by the Bay Area Clean Water Agencies (BACWA).

In addition, CCCSD would like to elaborate on BACWA's comment about the schedule for the nutrient strategy complementing CCCSD's permit-required studies on the impacts of nutrients in Suisun Bay. The attached Gantt chart incorporates CCCSD's study deadlines over the proposed nutrient strategy schedule. This illustrates that much of the information generated by the Nutrient Strategy effort will not be available by April 1, 2015, to aid in reassessing the appropriateness of the total ammonia effluent limits in Table 7 of Order No R2-2012-0016, NPDES No. CA 0037648. Due to the complexity of the issues that the Nutrient Strategy is examining, we believe the schedule as proposed is appropriate and we are not suggesting it should be escalated. However, we want to make the point that there may not be adequate information available for a comprehensive reassessment of the total ammonia effluent limits in our permit by the April 1, 2015 date.

CCCSD appreciates the Regional Board's consideration of the above comments and we look forward to contributing to the process. Please contact me at (925) 229-7302 or via email at afarrell@centrsan.org if you wish to discuss our comments.

Sincerely,

Ann E. Farrell, P.E.
General Manager

**cc: Jim Kelly, BACWA Executive Director
Mary Lou Esparza
Melody LaBella**

CCCSD Permit Milestones Overlayed on San Francisco Bay Nutrient Strategy Timeline

Task No.	Brief Task Description	2012				2013				2014				2015				2016			
		Q1	Q2	Q3	Q4																
<i>Element 1: Define the Problem</i>																					
1.1	Nutrient/Water Quality Conceptual Model and Scenario Building																				
<i>Element 2: Establish Guidelines</i>																					
2.1	Phytoplankton NNE Assessment Framework																				
2.2	Evaluate the Need to Revise Objectives for Ammonium																				
2.3	Review of Dissolved Oxygen Objectives																				
2.3a	Synthesis of existing dissolved oxygen data																				
2.3b	Evaluate the adequacy of the dissolved oxygen objectives, need for site-specific objectives																				
2.3c	Recommendations for additional data collection and monitoring																				
2.4	Macroalgal NNE Assessment Framework																				
<i>Element 3: Monitoring Program Development and Implementation</i>																					
3.1	Develop Monitoring Program																				
3.1.a	Recommend elements of a core SF Bay monitoring program																				
3.1.b	Develop the Bay nutrient monitoring program Work Plan and QAPP																				
3.2	Implement the Bay nutrient monitoring program																				
<i>Element 4: Modeling Strategy</i>																					
4.1	Modeling of External Sources																				
4.1.a	Synthesize existing data on external nutrient loads and data gaps analysis																				
4.1.b	Review models to simulate nutrient/organic carbon loads and test management scenarios																				
4.1.c	Monitoring Elements																				
4.2	Modeling of Load Response																				
4.2.a	Basic Numeric Modeling and Scenario Analysis																				
4.2.b	Review of existing models/platforms to model Bay hydrodynamics and water quality																				
4.3	Develop Modeling Strategy																				
4.4	Begin implementing modeling strategy																				

