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San Francisco Regional Water Quality Control Board
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Submitted electronically to nfeger@waterboards.ca.gov

Subject: Nutrient Management Strategy for San Francisco Bay Draft Version March 2012

Sacramento Regional County Sanitation District (SRCSD) appreciates the opportunity to provide comments on the March 2012 draft "Nutrient Management Strategy for San Francisco Bay" (Nutrient Strategy). SRCSD provides wastewater collection and treatment services to 1.4 million residents of the greater Sacramento area. SRCSD operates its treatment system in compliance with its National Pollutant Discharge Elimination System (NPDES) permit, providing protection of beneficial uses of the Sacramento River and Sacramento-San Joaquin Delta.

Overall we believe that the Nutrient Strategy is a good extension of the previous Nutrient Numeric Endpoint (NNE) documents and that it is the beginning of a solid framework for a scientific approach to nutrient management in the San Francisco Bay. However, we do have some concerns with the Nutrient Strategy which are detailed below.

General Comment:

We are concerned that the five year strategy and principal goal sequencing (page 4) could lead to hasty management decisions. The current five-year strategy proposes developing water quality objectives for nutrients prior to the development of nutrient load response models. The Nutrient Strategy acknowledges that the Bay is currently in an uncertain status with regard to nutrient impairment but changing conditions in the Bay may lead to impairment. Therefore, we have time to move expeditiously to develop scientific understanding and modeling tools and then apply those tools and information to assess various management scenarios as a component of the process of setting water quality objectives. It would be more prudent to develop water quality objectives *after* such information is developed.

We recommend changing the principal goals to:

1. properly characterize nutrient loads, from all sources, internal and external to the Bay;
2. develop conceptual models information to depict and understand the various processes, transformations, and effects associated with nutrients;
3. develop load-response modeling tolls to link loads to effects;
4. use modeling tools to examine the effectiveness of plausible nutrient management scenarios; and
5. use this information to inform regulators during the development of nutrient objectives in accordance with Sections 13241 and 13242 of the Water Code.

Specific Comments:

- Page 2, third paragraph: This paragraph mentions the need to coordinate development of the Bay NNE work plan with nutrient management activities in the Delta. We are reviewing the Delta Regional Monitoring Plan website to evaluate the possibilities of coordinating nutrient efforts.
- Page 3, last paragraph: This section mentions "Bay stakeholders;" it would be helpful to identify the "Bay stakeholders" in an appendix or point readers to where they can find a list of the stakeholders.
- Page 4, item 3.4: We are concerned that the Nutrient Strategy is proposing to list nutrients on the 303(d) list based on forecast results from a model. This approach seems speculative and needs more discussion amongst the stakeholders.
- Page 6, last paragraph: This paragraph proposes developing a consensus statement "about the present or future state of the estuary and concerns regarding nutrients and beneficial uses." It will be difficult to develop a consensus statement about existing conditions, and it will be extremely difficult to come to a consensus on future conditions. A more appropriate goal would be to develop a consensus statement on concerns, instead of trying to develop a consensus on what future nutrient conditions will actually be.
- Page 8, first paragraph, last sentence: What is the importance of determining the need and approach for incorporating ammonium into the NNE assessment framework?
- Page 9, The monitoring program for nutrients should be a subset of the Bay Area Regional Monitoring Program (RMP), and should be coordinated with the development of the Delta RMP.
- Page 10-Can a brief discussion of how McKee and Gluchowski, 2011, estimated external loads be included?
- Page 10, third paragraph, first sentence: Existing data points should be used when available, and not estimated if real data exists.
- Page 10, task 4.1b: Using a model to test the cost-effectiveness of various nutrient management activities is commendable, but could an example of a model that does this be provided.

- Task 4.1.c: Tasks 3.5, 1.5, and 1.6 are referenced under this task, but the strategy document does not include these tasks. Please identify what is included in these tasks.
- Task 4.2.b: Why is this the only task that has a deliverable?

We appreciate the opportunity to provide input on the Nutrient Strategy, and will continue to participate in the NNE process for the Bay. Should you have any questions about these comments, please contact me at 916-876-6008 or loftonj@sacsewer.com.

Sincerely,

Jason Lofton
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