



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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July 2, 2015

Via Electronic Mail Only

Ms. Jeanine Townsend
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
commentletters@waterboards.ca.gov

SUBJECT: Comment Letter – Central Valley Region Sacramento MUN Basin Plan Amendment

Dear Ms. Townsend:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the Basin Plan Amendment to Remove the Municipal and Domestic Supply (MUN) Beneficial Use in Twelve Constructed and/or Modified Water Bodies in the Sacramento River Basin that receive treated Municipal Wastewater from the Cities of Biggs, Colusa, Live Oak, or Willows (Basin Plan MUN Amendment). The Basin Plan MUN Amendment was adopted by the Central Valley Regional Water Quality Control Board (Central Valley Water Board) on April 16, 2015, and is being reviewed by the State Water Resources Control Board (State Water Board) pursuant to Water Code section 13245.

As you know, CVCWA is a nonprofit association of Publicly Owned Treatment Works (POTWs) located throughout the Central Valley whose primary mission is to represent wastewater agencies in regulatory matters while balancing environmental and economic interests. CVCWA's members have a deep commitment to the protection of beneficial uses in the waters of California, and are strongly committed to effectively implementing water quality controls to meet the goals of the federal Clean Water Act and California's Porter Cologne Water Quality Control Act.

CVCWA is supportive of the Basin Plan MUN Amendment as adopted by the Central Valley Water Board, and encourages the State Water Board to approve the amendment. The Basin Plan MUN Amendment is necessary to address the inappropriate application of MUN to the waterbodies in question. Specifically, the waterbodies in question are constructed or modified waterbodies designed to collect and/or convey agricultural drainage water. Downstream of the waterbodies are larger waterbodies that are *not* designated with MUN as a beneficial use. Further, the 12 waterbodies in question meet certain exceptions contained in the state's Sources of Drinking Water Policy. Thus, in accordance with the State Water Board's Order WQO 2002-0015,¹ the Central Valley Water Board now seeks to de-designate MUN from these 12 waterbodies. (WQO 2002-0015, pp. 25-28.)

CVCWA was an active participant in the NPDES permit hearings for the four small communities that discharge to these waterbodies. Without this Basin Plan MUN Amendment, these small communities will be forced to build expensive, unnecessary treatment facilities to meet MUN water quality standards even though such uses are not occurring in these waterbodies, or waterbodies directly downstream. Such costs are not reasonable under these circumstances.

Moreover, CVCWA has been an active participant in the Central Valley Water Board's stakeholder process and appreciates all of the Board's efforts and attention given to this basin planning activity.

In conclusion, this Basin Plan MUN Amendment is necessary to address the inappropriate application of the MUN to these specific waterbodies. Not only does the amendment implement valid exceptions in the Sources of Drinking Water Policy, but it also avoids the imposition of additional rates charged to small community ratepayers for unnecessary wastewater treatment.

Sincerely,



Debbie Webster
Executive Officer

cc (via email): Pamela Creedon, Central Valley Water Board (pcreedon@waterboards.ca.gov)

¹ *In the Matter of Vacaville's Easterly Wastewater Treatment Plant*, Order WQO 2002-0015.