



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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February 14, 2014

Via Electronically Only

Betty Yee
California Regional Water Quality Control Board,
Central Valley Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114
betty.yee@waterboards.ca.gov

SUBJECT: Amendments to the Water Quality Control Plan for the Sacramento River and
San Joaquin River Basins

Dear Ms. Yee:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the proposed editorial amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins (Basin Plan). 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 proposed amendments to the Policy for Compliance Schedules in National Pollutant Discharge Elimination System (NPDES) Permits.

Specifically, the proposed revisions to pages III-2.00 and IV-16.00 state that, “The Regional Water Board will establish compliance schedules consistent with the provisions of the State Water Board’s Compliance Schedule Policy (Resolution 2008-0025).” For the sake of clarity, we recommend that this sentence be revised to state as follows: “The Regional Board

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will establish compliance schedules in NPDES permits consistent with the provisions of the State Water Board's Compliance Schedule Policy (Resolution 2008-0025)." Although the paragraphs where this sentence appears are specific to NPDES permits, the paragraphs appear in context with a broader policy that applies to actions not solely related to NPDES permits. Accordingly, it is important to provide clarity on this issue.

Further, the Regional Board should consider including language that clarifies that the Regional Board, through Water Code section 13263, also maintains discretion to adopt compliance schedules in waste discharge requirements. The Basin Plan currently makes no reference to this discretion for non-NPDES permits.

Thank you for your consideration.

Sincerely,



Debbie Webster
Executive Officer

cc (*via email*): Pamela Creedon, Central Valley Regional Water Quality Control Board