



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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June 20, 2016

Via Electronic Mail Only

Beth Thayer
California Water Quality Control Board
Central Valley Region
11020 Sun Center Drive
Rancho Cordova, CA 95670-6114
beth.thayer@waterboards.ca.gov

RE: Tentative Waste Discharge Requirements for the City of Auburn, Wastewater Treatment Plant, Placer County

Dear Ms. Thayer:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the tentative Waste Discharge Requirements Order No. R5-2016-XXXX and NPDES No. CA0077712 for the City of Auburn (City) Wastewater Treatment Plant (Tentative Order). 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 letter, we support the provisions which allow the City of Auburn to work collectively with other Publically Owned Treatment Works (POTWs) through group studies, including the provisions for a Toxicity Evaluation Study (Special Provisions C.2.a.) and Mussels Studies (Special Provisions 6.b.).

CVCWA appreciates the Regional Water Board's willingness to work with CVCWA and Central Valley POTWs to address issues in a collaborative manner. We believe these collaborative studies can provide more robust information at reduced costs to POTWs and others.

CVCWA is currently working with many Central Valley POTWs on a Freshwater Mussels Collaborative Study. Through this study we have collaboratively compiled and reported on the known locations and species of Freshwater Mussels in the Central Valley in the State of Knowledge Report and are piloting using environmental DNA (eDNA) to determine the presence of freshwater mussels in waterbodies, rather than using traditional field surveys, since the current state of knowledge did not include most of the waterbodies POTWs discharge to. Collaborative Studies allow CVCWA to work with POTWs to further our knowledge and science more cost effectively than requiring similar studies individually.

The Tentative Order's Special Provisions section includes an encouragement that the City join CVCWA's group studies for Publicly Owned Treatment Works that discharge into waters that may support mussel communities. CVCWA supports this recommendation and hopes that the City considers joining this collaborative project to better understand freshwater mussels in the Central Valley and translate that information into reasonable beneficial use protection. However, we do support that POTWs be given a choice in these matters.

CVCWA is also currently working with Regional Water Board staff to address indications of low level toxicity. We have been collaborating with interested POTWs in our membership to develop a draft workplan, which we plan to discuss with Regional Water Board staff very soon. CVCWA is working with POTWs who have expressed interest in addressing low level toxicity indications collaboratively, including funding to implement the workplan. The City of Auburn is welcome to participate in these discussions.

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

Sincerely,



Debbie Webster,
Executive Officer

Cc (via email):

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