



# CVCWA

## Central Valley Clean Water Association

*Representing Over Fifty Wastewater Agencies*

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**TERRIE MITCHELL** – Vice Chair, Sacramento Regional CSD  
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October 17, 2014

**Via Electronic Mail Only**

Ms. Betty Yee  
Water Resources Control Engineer  
Regional Water Quality Control Board,  
Central Valley Region  
11020 Sun Center Drive  
Rancho Cordova, CA 95760  
[betty.yee@waterboards.ca.gov](mailto:betty.yee@waterboards.ca.gov)

RE: Comments on the Issue List and Work Plan for the 2014 Triennial Review of 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 Issue List and Work Plan for the 2014 Triennial Review of the Water Quality Control Plan for the Sacramento and San Joaquin River Basins (Draft Sacramento/San Joaquin Triennial Review). 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 provide limited comments with respect language contained in Issue 10 - Pesticide Control Efforts.

Specifically, the Draft Sacramento/San Joaquin Triennial Review states the following: “It is anticipated that adopting numeric objectives for these pesticides will facilitate implementation since well-defined pesticide objectives and compliance time schedules will be established.” As

worded, the statement does not properly reflect preparation of implementation plans as required by Water Code section 13242. Under the Water Code, when water quality objectives are adopted, a regional board is required to prepare a program of implementation for achieving the objectives. The program of implementation is required to include: (1) a description of the actions, which are necessary to achieve the objectives, including recommendations for actions to be taken by others; (2) a time schedule for the actions to be taken; and (3) a description of surveillance to be undertaken to determine compliance with the objectives.

The reference to “compliance time schedules” as used in the Draft Sacramento/San Joaquin Triennial Review implies that proposed Basin Plan amendments for pesticides will include compliance time schedules as adopted in permits rather than a time schedule for global actions that are outlined in a Basin Plan amendment. To avoid confusion, we recommend that this statement be revised to be consistent with and appropriately reference Water Code section 13242. Our suggested revision is as follows:

As is required by Water Code section 13242, the adoption of numeric objectives for these pesticides will include a program of implementation that includes a description of the nature of actions necessary to achieve objectives, time schedules for the actions to be taken, and a description of surveillance/monitoring that will be undertaken to determine compliance with objectives.

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](mailto:eoofficer@cvcwa.org).

Sincerely,



Debbie Webster,  
Executive Officer