



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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December 22, 2014

Via Electronic Mail Only

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

RE: Comment Letter—Central Valley Variances and Exceptions

Dear Ms. Townsend:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to submit comments on the proposed approval by the State Water Resources Control Board (State Board) of the amendments to the *Water Quality Control Plan for the Sacramento River and San Joaquin River Basins* and the *Water Quality Control Plan for the Tulare Lake Basin* (Basin Plans) to add policies for *Variances from Surface Water Quality Standards for Point Source Dischargers* (Variance Policy), a *Variance Program for Salinity* (Salinity Variance Program), and an *Exception from Implementation of Water Quality Objectives for Salinity* (Salinity Exception Program). 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,

CVCWA writes to support the amendments to the Basin Plans and encourage the State Board to approve the Variance Policy, the Salinity Variance Program, and the Salinity Exception Program.¹

With respect to the Salinity Variance Program and Salinity Exception Program, CVCWA and many of its members have been active participants in the Central Valley Salinity Alternative for Long-Term Sustainability (CV-SALTS), the Regional Board's planning process for salinity and nutrient management and regulation. While CV-SALTS continues to develop a long-term plan that addresses salinity comprehensively, in the interim period, CVCWA's members must comply with effluent limitations and other permit requirements based on the existing water quality objectives for salinity. These effluent limits may not be attainable, except with significant and expensive facility upgrades. Furthermore, the water quality objectives upon which the effluent limits are based are likely to be revised as a result of CV-SALTS or the State Board's review of the salinity standards in the Bay-Delta Plan.

The Salinity Variance Program and the Salinity Exception Program provide the Regional Board with a necessary regulatory tool to use in cases where the current objectives require an outcome that is likely to be inconsistent with the future salinity management plan in the Central Valley. CVCWA also believes that the Variance Policy in general helps to provide the Regional Board with an important regulatory tool that does not currently exist in the Basin Plans.

Accordingly, CVCWA encourages the State Board to approve the amendments to the Basin Plans in the form that the Regional Board adopted on June 6, 2014. 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 eofficer@cvcwa.org.

Sincerely,



Debbie Webster,
Executive Officer

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

¹ CVCWA similarly expressed its support in a timely comment letter to the Central Valley Regional Water Quality Control Board (Regional Board) when the Regional Board adopted the amendments to the Basin Plan.