



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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March 15, 2017

Via Electronic Mail Only

Xuan Luo
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, Suite #200
Rancho Cordova, CA 95670
Xuan.luo@waterboards.ca.gov

RE: Evaluation of Ammonia Water Quality Objectives for the Protection of Aquatic Life in the Central Valley

Dear Ms. Luo:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the Notice of California Environmental Quality Act Scoping for Evaluation of Ammonia Water Quality Criteria for the Protection of Aquatic Life in the Central Valley (Ammonia CEQA Scoping). 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 brief comments regarding the Central Valley Regional Water Quality Control Board's (Central Valley Water Board) proposed project to consider whether numeric water quality objectives for ammonia should be adopted into the Board's Water Quality Control Plans.

As a preliminary matter, the issue of ammonia is a significant one to all Central Valley POTWs, and in particular those that discharge to surface waters under terms prescribed in a National Pollutant Discharge Elimination System Permit. CVCWA has played an instrumental role in working with its members, and other POTWs, in assessing impacts to aquatic life from ammonia. This includes administering a Special Project to conduct studies with respect to the

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application of the latest U.S. EPA criteria for mussels issued in 2013. Accordingly, CVCWA respectfully requests that the Central Valley Water Board establish a stakeholder process for the development of amendments to Water Quality Control Plans for ammonia, and that CVCWA be a key member in that stakeholder process.

Second, as the Central Valley Water Board staff considers various options, CVCWA recommends that water quality objectives for the following scenarios be part of further discussion and deliberation:

- No Mussels Present
- All Species
- Only Species Present
- Attenuation in the receiving water
- Lack of receiving water conditions for colonization of mussels regardless of the designated beneficial use

Further, any surveillance and monitoring program with respect to ammonia should allow dischargers the option to use environmental DNA to determine compliance with any future adopted water quality objective.

Thank you for this opportunity to comment. CVCWA looks forward to working with Central Valley Water Board staff as they move forward with this very important project. Please contact me at (530) 268-1338 or eofficer@cvcwa.org with any questions.

Sincerely,



Debbie Webster,
Executive Officer

cc: Adam Laputz