



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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March 8, 2013

Submitted Electronically Only

Mr. Dale Harvey
Senior Engineer
Regional Water Quality Control Board,
Central Valley Region
1685 E Street
Fresno, CA 93706
dharvey@waterboards.ca.gov

**Re: Comments on Tentative Waste Discharge Requirements Order No. R5-2013-XXXX,
Planada Community Services District Wastewater Treatment Facility, Merced County**

Dear Mr. Harvey:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to submit these comments on the tentative Waste Discharge Requirements Order No. R5-2013-XXXX, Planada Community Services District Wastewater Treatment Facility (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 spirit, we provide the following comments regarding the Tentative Order's requirements for Salinity and Nutrient Management Plans.

I. Requirement to Submit Salinity and Nutrient Management Plans

The Tentative Order would require the discharger to submit individual, facility-specific Salinity and Nutrient Management Plans within 180 days from Order adoption. These

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requirements are inconsistent with the intent and purpose of the CV-SALTS process, which is working to develop region-wide salinity and nutrient management plans in accordance with the state's Recycled Water Policy. Requiring the development of such plans now on an individual facility basis undermines CV-SALTS, and fails to account for the fact that all have determined it more appropriate to manage these constituents on a larger scale versus on a facility-specific basis at this time. While it is important for individual facilities to currently manage these constituents to the maximum extent practicable, it is inappropriate to include the individual requirements specified here until CV-SALTS has completed its work.

We appreciate your consideration of these comments and request that you revise the Tentative Order as suggested above. 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

c: (via email)
Pamela Creedon – Central Valley RWQCB
Denise Soria – Central Valley RWQCB