



# CALIFORNIA ASSOCIATION of SANITATION AGENCIES

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## LATE COMMENT

July 1, 2015



Submitted via Electronic Mail to [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Felicia Marcus, Chair, and Members  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814

**SUBJECT: CASA Comment Letter - Central Valley Region Sacramento MUN  
Basin Plan Amendment**

Dear Chair Marcus and Members of the Board:

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to comment on the State Water Board's proposed approval of *A Basin Plan Amendment to Remove the Municipal and Domestic Supply (MUN) Beneficial Use in Twelve Constructed and/or Modified Water Bodies in the Sacramento River Basin that Receive Treated Municipal Wastewater from the Cities of Biggs, Colusa, Live Oak, or Willows (Basin Plan MUN Amendment)*. CASA is a statewide association representing more than 115 municipalities, special districts, and joint powers agencies that provide wastewater collection, treatment, clean energy and water recycling services to millions of Californians.

CASA supports adoption of the Basin Plan MUN Amendment as adopted by the Central Valley Water Board on April 16, 2015, and encourages the State Water Board to approve the amendment. The Basin Plan MUN Amendment is necessary to address the unreasonable application of the MUN designation to the waterbodies in question. Specifically, the above referenced waterbodies are constructed or modified waterbodies designed to collect and/or convey agricultural drainage water. Downstream of the waterbodies are larger waterbodies that are not designated with MUN as a beneficial use. Further, the 12 waterbodies in question meet certain exceptions contained in the state's Sources of Drinking Water Policy. Thus, this amendment implements valid exceptions in the Sources of Drinking Water Policy in accordance with the State Water Board's Order WQO 2002-0015, and de-designating MUN from these 12 waterbodies is entirely appropriate.

This Basin Plan MUN Amendment is necessary to address the inappropriate application of the MUN to these specific waterbodies. Without this amendment, the small communities identified above (and their ratepayers) will be forced to build expensive, unnecessary treatment facilities to meet MUN water quality standards even though such uses are not occurring in these waterbodies, or waterbodies directly downstream. Such costs are not reasonable under these circumstances.

CASA appreciates the effort and attention given to this basin planning activity by the Central Valley Water Board and stakeholders, including the Central Valley Clean Water Association (CVCWA). If you have any questions or require additional information, please contact Adam Link at (916) 446-0388 or [alink@casaweb.org](mailto:alink@casaweb.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Adam D. Link". The signature is fluid and cursive, with the first name "Adam" being the most prominent.

Adam D. Link  
CASA Director of Government Affairs