



CALIFORNIA ASSOCIATION of SANITATION AGENCIES

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Public Comment
Central Valley Variances and Exceptions
Deadline: 12/22/14 by 12:00 noon

December 22, 2014

Sent via Electronic Mail to commentletters@waterboards.ca.gov



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

Subject: **CASA Support for Central Valley Variances and Exceptions**

Dear Chair Marcus and Board Members,

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to provide comment on 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). CASA is a statewide association representing more than 100 municipalities, special districts, and joint powers agencies that provide wastewater collection, treatment, clean energy and water recycling services to millions of Californians. Several CASA members are located in the Central Valley Region. The proposed variance would provide a much needed a tool for managing salinity compliance issues, and also serve as a model for addressing other water quality challenges in the state that require long term comprehensive solutions. For these reasons, CASA supports the amendments to the Basin Plans and encourages the State Water Resources Control Board (State Water Board) to adopt the Variance Policy, Salinity Variance Program, and Salinity Exception Program.

CASA supports the work that has been spearheaded by the Central Valley Clean Water Association (CVCWA) and many other stakeholders on the Salinity Variance Program and Salinity Exception Program. CVCWA and CASA 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 the CV-SALTS process continues to develop a long-term plan that addresses salinity comprehensively, in the interim period, wastewater agencies 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 Water Resources Control Board's review of the salinity standards in the Bay-Delta Plan.

The Salinity Variance Program and the Salinity Exception Program provide the Central Valley Regional Board with a necessary regulatory tool to use in cases where the current objectives would otherwise require an outcome likely to be inconsistent with the future salinity management plan. Accordingly, CASA encourages the State Water Board to adopt the above referenced Variance Policy, Salinity Variance Program, and Salinity Exception Program.

Thank you for the opportunity to support the Central Valley Variances and Exceptions, and please do not hesitate to contact me at alink@casaweb.org or (916) 446-0388 if you have any additional questions or concerns.

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