

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION**

RESPONSE TO WRITTEN COMMENTS

on the Tentative Order for
the City of Sunnyvale
Sunnyvale Donald M. Somers Clean Water Facility and sanitary sewer system
Sunnyvale, Santa Clara County

The Regional Water Board received a written comment from the City of Sunnyvale (City) on a tentative order distributed for public comment on August 25, 2026. The comment is included below in *italics* and followed by a staff response. For the full content and context of the comment, refer to the comment letter. To request a copy of the comment letter, see the contact information in Fact Sheet section 7.7 of the Revised Tentative Order.

This document also contains staff-initiated revisions in addition to those arising from the response to comments. Revisions are shown with underline text for additions and ~~striketrough~~ text for deletions.

City of Sunnyvale

Comment: *On September 15, 2026, Sunnyvale City Council approved a name change for Sunnyvale's Water Pollution Control Plant (WPCP). The WPCP was formally known as the Donald M. Somers Water Pollution Control Plant and is hereby changed to "Sunnyvale Donald M. Somers Clean Water Facility" and can be referred to as the Clean Water Facility (CWF).*

Response: We updated the name of the facility throughout the Order and noted the change in the facility's name.

For example, we revised Provision 1 as follows:

Information describing the Sunnyvale Donald M. Somers Clean Water Facility (~~formerly called the Sunnyvale Water Pollution Control Plant~~) and sanitary sewer systems (collectively, Facility) is summarized on the cover page and in Fact Sheet (Attachment F) sections 1 and 2. Fact Sheet section 1 also includes information regarding the permit application.

And we revised Fact Sheet section 1.1 as follows:

The City of Sunnyvale (Discharger) owns and operates the Sunnyvale ~~Water Pollution Control Plant~~ Clean Water Facility and the City of Sunnyvale sanitary sewer collection system (collectively the Facility). The plant provides advanced secondary treatment of the wastewater collected from its service areas and

discharges to Moffett Channel, a tributary to South San Francisco Bay via Guadalupe Slough. Prior to September 2026, the Facility was named the Sunnyvale Water Pollution Control Plant.

Additional changes to address the updated name of the facility were made throughout the Order.

Staff-Initiated Changes

In addition to minor editorial and formatting changes, we revised the tentative order to list the next appropriate test species for chronic toxicity testing, should *Mytilus galloprovincialis* encounter supply issues. We also updated the date of the most recent compliance inspection.

We revised Monitoring and Reporting Program section 5.1.2. as follows:

If testing a particular species proves unworkable (e.g., the Discharger encounters unresolvable test interference or cannot secure a reliable supply of test organisms), the Executive Officer may authorize in writing the temporary use of the next appropriate species ~~of those listed in MRP Tables AE-1 and AE-2 as the most sensitive species, which was shown to be fathead minnow (*Pimephales promelas*).~~ The Executive Officer will specify a temporary designation of the most sensitive species in writing.

We revised Fact Sheet section 6.1.3. as follows:

This Order includes the requirement to use *Mytilus galloprovincialis* for chronic toxicity tests, unless the Discharger encounters unresolvable test interference or cannot secure a reliable supply, in which case the Order allows for the temporary use of fathead minnow (*Pimephales promelas*), the second most sensitive species based on identified in the Discharger's 2024 chronic toxicity species sensitive screening, which satisfied the minimum screening requirements stated in Toxicity Provisions III.C.2.a, and MRP Appendix E-1, section 2.1.2.

We revised Fact Sheet **Table F-1. Facility Information** as follows:

Date of Last Inspection ~~June 26, 2025~~ September 21, 2026