



CVCWA Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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March 4, 2019



Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
commentletters@waterboards.ca.gov

Re: Comments in Support for Resolution to Authorize Use of SEP Funds for
Delta RMP Projects

Dear Ms. Townsend and Board Members:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the tentative Resolution to Authorize Use of Supplemental Environmental Project (SEP) Funds for Delta Regional Monitoring Program (Delta RMP) Projects (Resolution). 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 the following comments in support of the Resolution.

CVCWA supports the State Water Resources Control Board's (State Water Board) approval of the ability for the Central Valley Regional Water Quality Control Board (Central Valley Water Board) to allocate some SEP funds to Delta RMP projects. Several of CVCWA's members are active participants in the Delta RMP and understand firsthand the importance of the water quality studies and information the Delta RMP produces. However, the current funds available to the Delta RMP are not always enough to fully fund all planned RMP projects. Authorizing the allocation of SEP funds toward Delta RMP projects that are underfunded will enable the Delta RMP to continue the valuable work it is doing to better understand water quality in the dynamic Delta ecosystem.

Many of the projects managed by the Delta RMP are incredibly valuable to understanding Delta water quality, yet do not meet the specific SEP standards as set forth in the 2017 Supplemental Environmental Projects Policy (SEP Policy), related to specific scopes of work and time schedules for completion. But, consistent with part I.A. of the SEP Policy, the Delta RMP and its projects substantially comply with the SEP Policy in that the projects investigate water quality challenges (e.g., mercury, pesticides, toxicity, etc.) and identify means through which such challenges to public health and/or the environment can be reduced or avoided. This Resolution will enable dischargers and the Central Valley Water Board to apply SEP funds to these important projects.

We appreciate your consideration of these comments. If you have any questions, or if CVCWA can be of further assistance, please contact me at eofficer@cvcwa.org or (530) 268-1338.

Sincerely,



Debbie Webster,
Executive Officer

cc: Patrick Pulupa