



September 9, 2016

Ms. Jeanine Townsend
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

VIA EMAIL: commentletters@waterboards.ca.gov

Subject: Request for expanded stakeholder engagement on Water Quality Enforcement Policy updates

Dear Ms. Townsend:

The Bay Area Clean Water Agencies (BACWA) appreciates the opportunity to comment on the amendments to the State Water Resources Control Board's (State Water Board) Water Quality Enforcement Policy (Policy). BACWA is a joint powers agency whose members own and operate publicly-owned treatment works (POTWs) and sanitary sewer systems that collectively provide sanitary services to over 6.5 million people in the nine-county San Francisco Bay (SF Bay) Area. BACWA members are public agencies, governed by elected officials and managed by professionals who protect the environment and public health.

BACWA would like to thank the State Water Board for extending the original comment deadline for the proposed amendments to the Policy. Since any changes to the Policy could have substantial impacts on our members we will use the additional time to give the proposed amendments the detailed review they deserve. However, we do feel that it would be preferable to give stakeholders the opportunity to engage in the Policy update as part of the process (e.g., workshops, meetings with representative stakeholder groups). This kind of outreach to stakeholders has become a trademark of the State Water Board's regulatory development practice in recent years, but has been absent in this particular process. Additionally, the Policy would benefit if the State Water Board would accept comments on sections of the Policy that are beyond the scope of the proposed amendments. Since there is no deadline to revise the Policy, it would be beneficial to both the enforcement and permitted communities to take the time to ensure that there is robust communications between the two groups as the Policy revisions are being developed.

I would be pleased to discuss this matter further at your convenience.

Respectfully Submitted,

A handwritten signature in cursive script that reads "David R. Williams".

David R. Williams
Executive Director
Bay Area Clean Water Agencies

cc: BACWA Executive Board
Adam Link, CASA Director of Government Affairs, California Association of Sanitation Agencies
Roberta Larson, Executive Director, California Association of Sanitation Agencies
John Pastore, Executive Director, Southern California Alliance of Publicly Owned Treatment Works
Debbie Webster, Executive Officer, Central Valley Clean Water Associations
Elizabeth Allen, Executive Director, California Water Environment Association