



March 6, 2017

Robert Schlipf
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

VIA EMAIL: Robert.Schlipf@waterboards.ca.gov

Subject: Comments on Tentative Order: NPDES Permit No. CA0037648, Regional Water Quality Control Board Order No. R2-2017-00XX for Central Contra Costa County Wastewater Treatment Plant and its wastewater collection system

Dear Mr. Schlipf:

The Bay Area Clean Water Agencies (BACWA) appreciates the opportunity to comment on the Tentative Order issued to the Central Contra Costa County Wastewater Treatment Plant and its wastewater collection system (CCCSD). 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 7.1 million people in the nine-county San Francisco 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 take the opportunity to express its continued support for addressing nutrients through the Nutrient Watershed Permit. In Section 1.C of the Fact Sheet, this Tentative Order acknowledges the work that CCCSD conducted as part of its previous permit, and defers future studies to the San Francisco Bay Nutrient Management Strategy. The contrast between this Tentative Order, and the CCCSD's current permit serve to illustrate the benefit of funding studies on a Regional basis, and directing science priorities via a steering committee made up of stakeholders, rather than by NPDES permit.

BACWA appreciates the opportunity to comment on this Tentative Order and looks forward to continued collaboration with the Regional Water Quality Control Board on nutrients.

Respectfully Submitted,

David R. Williams

David R. Williams
Executive Director
Bay Area Clean Water Agencies

cc: BACWA Board