

May 8, 2024

Mr. Robert Schlipf, P.E.
Water Resource Control Engineer
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612
Electronic Submittal to: Robert.Schlipf@waterboards.ca.gov

SUBJECT: Public Comments on Tentative Order for Waste Discharge Requirements for Nutrients from Municipal Wastewater Discharges to San Francisco Bay, NPDES Permit CA0038873

Dear Mr. Schlipf:

I am writing to you as a concerned resident and ratepayer of Central Contra Costa Sanitary District (Central San) regarding the Regional Water Board's tentative order on nutrients. I urge the Water Board to consider the significant financial impacts of the proposed nutrient reductions, and to allow more time to develop solutions that best protect San Francisco Bay and benefit our communities.

Meeting the steep nutrient reduction requirements region-wide under a short timeline will cost more than \$11 billion. Central San customers alone will be on the hook for \$665 million, or nearly \$5,500 per household when debt service is taken into account. Even with bond funding to spread costs over time, we could see our bills go up by 28% or nearly \$200 a year. This is a costly burden for many vulnerable members of our community and working families already struggling to make ends meet.

Moreover, the scientific research must be completed to assure that proposed nutrient reductions will have the intended benefit to the Bay. Under this hasty order, Bay Area residents will be saddled with expensive requirements with no assurance that they will improve the health of the Bay. Central San, along with the Bay Area's other clean water agencies, has been participating in scientific research to understand how and why nutrients are impacting the Bay. We must allow time for this science-based approach to understand the true needs of the Bay.

Finally, the shortened timeline of the proposed requirements precludes the ability to implement thoughtful, win-win solutions that provide multiple benefits, including regional recycled water projects that would reduce nutrient impacts to the Bay while also conserving our precious drinking water supplies, especially in the face of climate change.

The Water Board must develop a science-based, financially sound pathway toward nutrient management in the Bay that is worthy of the investment by Bay Area residents. I urge you not to rush into implementing this order. Instead, the Water Board should revamp its strategy to:

1. Grant a 90-day extension to the comment period to allow the public adequate time to provide input on this important and financially impactful decision.
2. Conduct a hearing of community concerns before considering adoption of the order.
3. Allow time for the necessary scientific research to better understand nutrient reductions that will benefit the Bay.
4. Develop a financial analysis to determine how the proposed order will impact Bay Area residents, as well as how we can mitigate this significant burden—which comes on top of numerous other essential infrastructure needs—for our communities.

Thank you for considering my concerns.

Sincerely,

Ecc:

Regional Water Board

Eileen White, Executive Officer, Eileen.White@waterboards.ca.gov

Bill Johnson, Manager of NPDES Wastewater Division, Bill.Johnson@waterboards.ca.gov

Gaurav Mittal, Water Resource Control Engineer, Gaurav.Mittal@waterboards.ca.gov

Office of the Governor

Yana Garcia, Secretary for Environmental Protection, Yana.Garcia@calepa.ca.gov