

BACWA Member,

BACWA has initiated discussions within its Nutrient Strategy Team and with Regional Water Board staff on the 3rd Nutrient Watershed Permit. The current permit expires in 2024, but may be extended for one or two years depending on the pace of the science. As a part of the negotiation process BACWA is working to develop recommendations on the key tenets of the next Watershed Permit. To inform these recommendations, we are gathering information from agencies about their Total Inorganic Nitrogen (TIN) load projections over the next ten years, as well as asking for an update on the status of their nutrient reduction planning and implementation.

In the Fact Sheet of the 2nd Watershed Permit, adopted in May 2019, the Water Board stated that they expect to implement nutrient load caps by subembayment in the 3rd Watershed Permit in 2024.

Absent strong evidence that the SF Bay is either under imminent threat from nutrients, or conversely, that there is significant additional assimilative capacity, load caps would aim to curtail further nutrient load increases beyond 2024. The final decision on load caps will, of course, rely on findings from the scientific studies conducted via the Nutrient Management Strategy Science Plan over the next several years.

In order to provide plants a view of what the future might hold, the Water Board established baseline dry weather TIN loads (2014 through 2018 average loads) and “planning level targets” in Table F-5 of the of 2019 permit. The planning level targets were calculated by adding a 15% “buffer” to the baseline loads to account for growth that will take place between 2019 and 2024. The buffer was based on projected growth but was intended to be generous enough such that in 2024 all plants should be able to meet the load caps anticipated for the 3rd Watershed Permit.

Now that we are moving into 2021, the Water Board states that they still intend to establish some form of load restrictions in the third watershed permit. However, there is some latitude for negotiating at what level those caps are set, how compliance could be evaluated, and how compliance schedules might be timed. To best represent our members’ interests as part of this negotiation, BACWA is collecting information from plants to evaluate their ability to comply with different potential load cap scenarios.

IT IS IN YOUR PLANT’S BEST INTEREST TO PROVIDE THIS INFORMATION VIA THE ATTACHED SURVEY IF YOUR AGENCY WAS ASSIGNED A PLANNING LEVEL TARGET IN THE 2ND WATERSHED PERMIT.

We request that your facility complete this survey by Tuesday February 16, 2021 so that we can develop a key Tenets document and ideally reach an agreement on permitting approach with the Regional Water Board in 2021. Please direct any questions to BACWA Executive Director Lorien Fono at lfono@bacwa.org.

* 1. Name of Agency

* 2. Name of Facility

* 3. Respondent Name & Position

* 4. Respondent email address

TIN Loads Projection

These questions will inform our projections of the changes in projected loads due to nutrients entering members' plants. BACWA will look at historical data to better understand inter-annual variability, and combine the data provided via this survey with an analysis of variability to estimate when agencies and subembayments might exceed load caps under a range of regulatory scenarios.

* 5. Does your agency have a projection of change in dry season TIN loads over the next ten years? (If no, skip question 6)

Yes

No

6. What is your projected percentage annual change in TIN loading due to population increase over the next ten years (average % per year over ten years)?

7. Does your agency currently operate a project that receives and beneficially reuses organics for codigestion?

yes

no

If yes, what percentage of your current loads are due to this project? (% of current total)

8. Is your agency planning or considering a project to receive and beneficially reuse organics for codigestion?

Yes

No

If yes, how will this project change your nutrient loading (% over current total)

9. Besides increased population and co-digestion, is your agency planning any other projects that would increase dry season TIN loads to San Francisco Bay? If yes, please describe the project below, its timing, and the percentage by which it will increase loads over your current level (2020 data).

10. If a load cap were implemented as described in the Fact Sheet of the 2nd Watershed Permit (i.e. 2014 to 2017 baseline plus 15%), has your agency calculated when you might exceed it?

Yes

No

If yes, what year or within what range of years would your agency exceed the cap (if a load cap were implemented)?

Status of Planning, Construction for Reducing Your Nutrient Loads to the Bay.

The following questions will allow BACWA to get a snapshot of where our member agencies stand in terms of planning or implementing projects. Ideally a 3rd Watershed Permit will only require agencies to continue the work they are already planning or implementing.

* 11. As a result of previous recent improvements at your plant, is your plant already discharging reduced nutrient loads such that your agency anticipates it would be able to comfortably meet the load caps listed in [Table F-5](#) for the foreseeable future?

Yes

No

If Yes, describe what the recent improvements that have been completed (as of January 2021).

* 12. Has your agency already identified and moved to implement capital improvements that will result in reducing your dry season TIN loading to the Bay?

Yes

No

If yes, briefly describe the project and its status, and provide the anticipated completion year of construction.

13. If you answered Yes to question 11 or 12, what is the dry weather TIN concentration (or TIN load) that you expect to achieve?

14. If you answered Yes to question 11 or 12, does your project include the possibility of future upgrades without stranded assets to further decrease nutrient loads if the science shows the need for further reductions?

yes

no

Please explain your response.

15. If you have not completed and are not in the process of implementing a project to reduce nutrient loads, please describe the status of your planning efforts.

16. If you have not completed and are not in the process of implementing a project to reduce nutrient loads, how many years would it take your agency to realistically complete a project (from start to completion) to reduce nutrient loads?

* 17. The Nutrient Reduction Study was completed in compliance with the first Watershed Permit in 2018 and identified nutrient reduction alternatives for individual agencies. Has your agency conducted any additional evaluation of nutrient reduction alternatives since your Nutrient Reduction Study individual agency report was completed? Alternatives could include treatment upgrades or load reduction by other means, such as recycled water expansion.

yes

no

If Yes, please describe what new findings or alternatives have been identified since the 2018 report and whether or not you have developed updated cost estimates.

18. BACWA's negotiations with the Water Board take place within the context of competing priorities for capital funds. Please list the major wastewater capital projects that your agency is planning over the next decade.

19. Please provide any other clarifying information on your agency's plans to reduce or increase nutrient loads that you would like conveyed to the Regional Water Board as part of the Watershed Permit negotiations.

20. I would like a copy of my responses emailed to me.

Yes

