

CENTRAL VALLEY CLEAN WATER ASSOCIATION

STRATEGIC PLAN

2016-2017

Our mission is to effectively represent the interests of wastewater agencies in the Central Valley in regulatory matters and to support the exchange of information so members can best meet their business challenges.

I. Introduction

Central Valley Clean Water Association (CVCWA) was formed in 1987 primarily as a forum to exchange information on management and operations of public wastewater treatment systems (POTWs)¹ in the greater Sacramento and San Joaquin Valleys. In 2003, CVCWA was incorporated as a non-profit organization and started taking a more proactive role in the regulatory arena.²

Given the current dynamic regulatory environment there is a clear and continuing need to position the organization as a leader in representing member interests. This Strategic Plan is a result of examining the regulatory environment and issues faced by members, and an evaluation of how this organization can best serve its members to meet the future challenges faced by its members.

Regulatory decisions have caused the cost of services to rise sharply, often without clearly identified environmental benefits. Regulatory, legislative, and judicial decisions have established a direction with far reaching and long enduring adverse consequences for members. As a result, members need to respond to emerging trends in a unified manner to ensure that future generations will be the beneficiaries of our combined environmental stewardship of clean water. It is clearly the intent of CVCWA to approach regulatory matters with a perspective that balances environmental and economic interests.

¹ Publically Owned Treatment Works.

² When CVCWA incorporated it formally changed its name from the Central Valley Wastewater Manager's Association to the Central Valley Clean Water Association.

II. Approach to Strategic and Business Planning

This Strategic Plan has a five-year planning horizon and is intended to:

- Set the long-term direction for the organization.
- Capture emerging trends and issues that impact members.
- Establish the strategies that will be employed by the organization.
- Carry forward issues that need to be kept in mind as the organization progresses.
- Provide a common basis for establishing short-term priorities.

The Business Plan has a one-year planning horizon and is intended to:

- Set the short-term actions for the organization.
- Serve as basis for establishing annual budget needs

The Strategic Plan and Business Plan are living documents. This allows the organization to adjust its course and respond to changing trends. The Strategic Plan will be updated at least every two years, and the Business Plan will be updated on an annual basis.

The primary audience for both the Strategic Plan and the Business Plan is members within the organization and potential future members.

III. Strategies

CVCWA shall utilize the following strategies to accomplish its mission and goals pertaining to the collection, treatment, disposal, and recycling of wastewater and its residuals. Primary strategies are those that shall be given the highest priority for the organization. Secondary strategies will be practiced to a lesser degree.

Primary Strategies

Regulatory Process Participation - Assure that regulatory actions are protective of the environment, are based on sound scientific information, and reflect a fair and reasonable economic basis. Ideally this will be achieved by working with regulators cooperatively starting at the beginning phases of regulatory development. It should be supported by serving as a resource to regulators, participating in stakeholder efforts and by providing constructive comments throughout regulatory proceedings.

Information Sharing – Become a resource to communicate, exchange ideas, coordinate, share information, provide education, and serve as a technical resource on issues. This shall be done among the member agencies and with other agencies and organizations. It is intended that the information sharing complement and not duplicate the work of California Water Environment Association (CWEA) and others. This strategy includes:

- Sponsoring annual conferences on issues of importance to CVCWA.
- Dissemination of research information to keep members current on science and technology.
- Dissemination of pertinent regulatory issues to the membership
- Fostering information sharing on treatment plant and collection system operational and maintenance issues.

Recognized Industry Leadership in Relating to Wastewater Regulatory Agencies and the Regulated Community - Maintain a recognized position of leadership as a visible and credible resource to wastewater regulatory agencies, regulated agencies and industry, and organizations that have focused wastewater interests.

Strategic Alliances – Promote strategic partnerships among member agencies and with other agencies and organizations that share common objectives to maximize CVCWA’s effectiveness and strength.

Membership – Recruit and retain a broad membership base from throughout the Central Valley to add strength to the organization and promote strong commitments of member agencies to support CVCWA with resources.

Committees and Special Projects– Use committees within CVCWA to organize work efforts. Use workgroups, when desirable, either within committees or for cross-committee work. Use special projects for a desired activity (ex. development of scientific information or a regulatory initiative) where additional funding resources are needed and a collaborative effort is desired

Research – Promote, sponsor and generate research. This primarily focuses on developing information to support regulatory decisions, particularly when such research is required for individual POTWs but can be completed collaboratively.

Secondary Strategies

Legislation – Promote legislation that supports the mission of the organization. This may become a primary strategy in the future if efforts in regulatory forums are unsuccessful or if intervention in or through legislation is needed.

Recognized Industry Expertise in Relating to Media and Public - Take actions to improve standing as a visible and credible resource with the media and general public related to wastewater issues.

Litigation – As a last resort take legal action that supports the mission of the organization if efforts in regulatory or legislative forums are unsuccessful.

IV. Organizational Development

Continuous improvement in the inner workings of the organization, expanding membership, and seeking new ways to further the mission are all critical to CVCWA's long-term success. This section of the strategic plan focuses on long term changes that are needed in how CVCWA is organized and managed.

Committees

CVCWA's standing committees include:

- Water (Surface Water / NPDES) with its subcommittees and workgroups: Water Recycling Subcommittee, Mercury/Methylmercury Subcommittee, Delta Team, Delta RMP workgroup, and Toxicity Workgroup)
- Land Discharge / Groundwater (with various subcommittees or workgroups as needed)
- Biosolids
- Collection Systems (with various subcommittees or workgroups as needed)
- Outreach
- Operations and Maintenance
- Air and Climate Change
- Laboratory

Within or in combination with one or more committees, workgroups may be formed to address specific issues as issues arise. Workgroups should report back periodically to inform committee members of the status of discussions and regarding recommendations made by the workgroup. Workgroup recommendations should be vetted with the assigned committee, as necessary.

Current cross-committee workgroups include:

- Salinity Coordination Team
- Small Community Issues

Additional cross-committee workgroups to address specific issues may be formed as the need arises. The status of discussions and recommendations should be made by workgroup members to applicable committees.

Where similar information is disseminated through another of CVCWA's strategic partners and joint meetings are beneficial, CVCWA committees have held co-meetings. Currently:

- The Recycled Water Subcommittee meets with WaterReuse of the Valley/Foothills
- The Biosolids Committee meets with the CASA Land Regulatory Workgroup
- The Air/Climate Change Committee meets with the CASA Energy Group

The following committees may be established in the future years as warranted:

- Pretreatment and Source Control: This will depend on whether members express interest in pursuing this topic and the effectiveness of addressing this area by other organizations such as California Water Environment Association (CWEA).
- Utility Management: This will depend on whether members express interest in pursuing management issues through CVCWA.
- Small Systems: Small systems face a number of key problems that are significantly different from large and medium sized agencies. Examples include, more limited resources to build operate and maintain infrastructure, lack of expertise to assist in utility management, and staffing difficulties. Formation of this committee area will depend on the ability to find leadership to run the committee.

Special Projects

Special Projects are efforts undertaken by the CVCWA membership that require more significant financial resources to complete. The funding of special projects comes from membership donations beyond normal annual membership dues. Although participation in special projects is voluntary, the governance of the special project committee including voting rights, financial contribution levels, etc. is determined by those financially participating in the special project.

Additionally, the Regional Water Board has approached CVCWA on several occasions to facilitate collaborative studies or efforts. In these cases, the Regional Water Board has given individual permit holders the option to participate in a collaborative study or to join a group study. In cases where CVCWA has taken the lead to form and oversee a study, this has been done through a Special Project.

All work products developed through a special project must be consistent with CVCWA's positions.

CVCWA's current special projects include:

- CV-SALTS Special Project
- Methylmercury Special Project
- Permitting and Regulatory Advocacy Special Project
- Freshwater Mussels Special Project

Three special projects have been completed or are currently inactive:

- Advanced Treatment Special Project
- Mercury Control Study Special Project
- Salinity Variance Special Project

Membership

CVCWA will actively seek to maintain and expand its membership. It is important to focus on increasing the number of members because CVCWA can more effectively represent the interest of the diverse population of POTWs in the Central Valley, there is strength in numbers and an increasing membership will reduce the financial and staff burden on existing members. The following areas warrant particular attention:

- POTWs in the northern area. Currently, there are only a few members fitting this profile.
- Small POTWs in the southern area. Currently there are few members fitting this profile.
- Satellite Collection System Agencies. Collection system issues are growing in importance.
- Small land discharging POTWs. Some of the current legislative and regulatory initiatives could impact these POTWs most.
- Membership retention.

Small POTWs are very important in maintaining a broad based organization. Regulatory precedents set with small POTWs can have widespread implications affecting others. Additionally, regulatory decisions typically have greater cost burden to small POTWs due to smaller rate basis. Thus it is very important that small POTWs obtain information and assistance from CVCWA.

Large and medium POTWs are reasonably well represented in CVCWA. It is important to maintain the current members in these profiles as a minimum. The large and medium POTWs bring significant resources to the organization.

Other types of members that would be beneficial to the organization include:

- Consultants as affiliate members – because of the technical capabilities that are brought to the organization.
- Biosolids recyclers – because of the mutual interests in management of biosolids.
- Private wastewater treatment system operators – because of commonalities in regulatory issues with public wastewater treatment agencies.

CVCWA provides valuable services to its members which results in significant cost saving for its member agencies. CVCWA achieves these savings by representing its member agencies on regulatory issues before the Regional and State Water Boards. Regulatory decisions have the potential to result in costly regulations and/or legislation with no measurable water quality benefits. By participating in the regulatory process, CVCWA can bring its member's concerns, current science and workable solutions to regulatory

decision making. CVCWA also disseminates useful information to its member agencies. Meeting the needs of its member agencies and communicating CVCWA's activities and achievements is key to maintaining and building membership.

Partnerships and Alliances

The top priority for CVCWA is to establish good working relationships and open communications with the Central Valley Regional Water Quality Control Board and the State Water Resources Control Board.

The second priority is to develop partnerships with several wastewater collection and treatment oriented organizations in the State that share common goals. Information sharing through networking and collaboration on projects effectively brings resources and strength to CVCWA and can be effective in generating support for CVCWA issues. By working with our clean water partners on issues of statewide and regional significance, such as water quality objectives, volumetric pricing, etc.), CVCWA can, in most cases, leverage its resources best. The following organizations have been identified and having high priority:

- California Association of Sanitation Agencies (CASA)
- Bay Area Clean Water Association (BACWA)
- Southern California Alliance of Publicly Owned Treatment Works (SCAP)
- California Water Environment Association (CWEA)
- WateReuse: Central Valley – Sierra Chapter

To further partnership with other clean water organizations, CVCWA participates in the Clean Water Summit Partners with CASA, BACWA, SCAP and CWEA. This partnership meets bi-annually and the Executive Directors communicate by conference call at least quarterly.

The third priority is developing partnerships with other stakeholder groups, especially within the Central Valley, that have similar interest and impacts from impending regulatory efforts or need for science. Current efforts, such as CV-SALTS brings multiple stakeholders (agricultural, POTWs, Point Sources, Community NGOs, etc.) to work on collaborative solutions.

CVCWA can benefit significantly from developing partnerships with broader based organizations. Organizations that should be considered include but are not limited to:

- California Coalition for Clean Water (CCCW)
- California Rural Water Association (CRWA)
- Regional Council of Rural Counties (RCRC)
- California Storm Water Quality Coalition (CASQA)

- WasteReuse Association (WRA)
- Groundwater Resources Association (GRA)
- California Collection System Collaborative Benchmarking Group (CCSCBG)
- National Association of Clean Water Agencies (NACWA)
- California League of Cities
- Manufacturers Council of the Central Valley
- California League of Food Processors
- Central Valley Agricultural Coalitions

Other organizations that share common interests with CVCWA

Staff and Support Services

CVCWA has a part time Executive Officer under contract and, through CASA, is engaging services of administrative assistance: The following services have also been retained:

- Accounting
- General Legal Assistance
- Technical Assistance

CVCWA recognized the impact the economic downturn and drought has had on its member agencies and thus kept membership dues steady or at very small increases during the most severe years of the economic downturn. Recently CVCWA has raised its dues to cover its costs and rebuild its reserves for future needs, CVCWA is sensitive to the financial pressures facing its agencies. To reduce costs, CVCWA seeks opportunities where its member agencies can provide administrative support services to allow the Executive Officer to focus on regulatory matters.

VI. GUIDING PRINCIPLES

Following are key principles that should serve to guide CVCWA in establishing positions on issues of importance to members. It is intended that CVCWA supplement these guiding principles with more defined positions on specific issues and maintain a record of such positions for easy reference.

In accordance with applicable CVCWA Bylaws and Standing Rules, committees and members of CVCWA can advocate for the guiding principles and established positions in legislation, regulation, or other forums. Because not every issue can be foreseen, the guiding principles and many of the positions are broad in nature to allow CVCWA flexibility to act in a timely manner without needing approval by the Board.

CVCWA holds the position that regulations and regulatory agency actions should:

- Protect, preserve, and enhance environmental quality while balancing environmental needs with social and economic needs.
- Recognize that there are inherent and differing risks associated with all levels of environment controls, and that it is not possible to eliminate risks and eliminate all pollutants from the environment. Therefore, decisions should be based on acceptable risks.
- Use a risk management approach to decision making. Risk assessment uses factual data to evaluate the likelihood that an adverse effect may result. Risk management weights policy alternatives and selects the most reasonable regulatory action by integrating the results of the risk assessment with factual data, social, economic and political concerns.
- Rely on sound science and good data in making decisions. When science and good data is lacking, and there are indications of possible significant impacts to human health and the environment, resources should be focused on developing the science and data rather than placing burdensome restrictions based on an abundance of caution approach. When science and data do not reflect current knowledge and circumstances they should be set aside and replaced.
- Recognize and promote the benefits of recycling to extend the use of our natural resources with the goal of achieving sustainable environmental systems.
- Recognize and promote the conjunctive use of our water resources.
- Result in cost effective and practical solutions. Requirements should not place unrealistic burdens that lead to non-compliance and unnecessary liability.

- Reflect the real needs and uses of our natural resources. Protection of beneficial uses that do not exist or are not likely to exist in the future should be avoided.
- Focus on improving the environment by preferentially taking actions that have the greatest benefit to cost ratios. Avoid actions with lower benefit to cost ratios simply because regulatory authorities are available.
- Use enforcement actions as opportunities to fix problems. Punitive actions, regulatory proceedings, and legal proceedings that divert resources away from fixing the problems should be avoided.
- Channel expenditures for environmental actions towards those that are contributing to the problem in proportion to their contribution.
- Use open public processes where affected parties are given ample opportunity to be part of the decision making process.
- Reduce or replace existing regulations with the goal of developing consistency and compatibility across regulatory and enforcement agencies at the local, state and federal level.
- Seek consistency in interpretation and application of regulations throughout the State.
- Avoid use of un-adopted underground regulations.
- Recognize and balance cross media impacts in establishing policies and regulations for the best overall benefit of the environment. Media include surface water, ground water, land, air, and climate.