



PERMITTING & REGULATORY ADVOCACY SPECIAL PROJECT

CVCWA ANNUAL CONFERENCE

SEPTEMBER 25, 2025

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Permitting & Regulatory Advocacy Special Project

- As part of CVCWA, members can form “special projects” for specific purposes that are funded separately from annual dues.
- The Permitting & Regulatory Advocacy (PRA) Special Project has been funded and running since 2004.
- The purpose is to:
 - “develop informational materials, tools, technical and advocacy documents, and to provide legal and technical support to public wastewater management agencies within the jurisdiction of the Central Valley Regional Water Quality Control Board to ensure that Regional Board permits, policies and regulations provide reasonable protection to the waters of the region and limited public resources are spent efficiently to achieve real water quality benefits.”

PRA Special Project Funding

- Funding Agencies provide separate funding based on a cost-share formula that pays for consultants to support the PRA Special Project.
 - Under the cost-share formula, 50% of the budget is allocated based on a fixed share, and 50% is proportionally allocated based on permitted flow.
- In 2004, five Central Valley POTWs formed and funded the PRA Special Project.
- In 2025, seven Central Valley POTWs participate and fund the PRA Special Project. Additionally, CVCWA contributes from the General Fund, and a CVCWA Board member participates on the Steering Committee.
- The Funding Agencies provide direction to the consultant team:
 - Somach Simmons & Dunn
 - Larry Walker Associates
 - Kahn Soares & Conway

2025 Funding Agencies

- SacSewer
- City of Fresno
- City of Stockton
- City of Roseville
- City of Vacaville
- City of Yuba City
- City of Davis

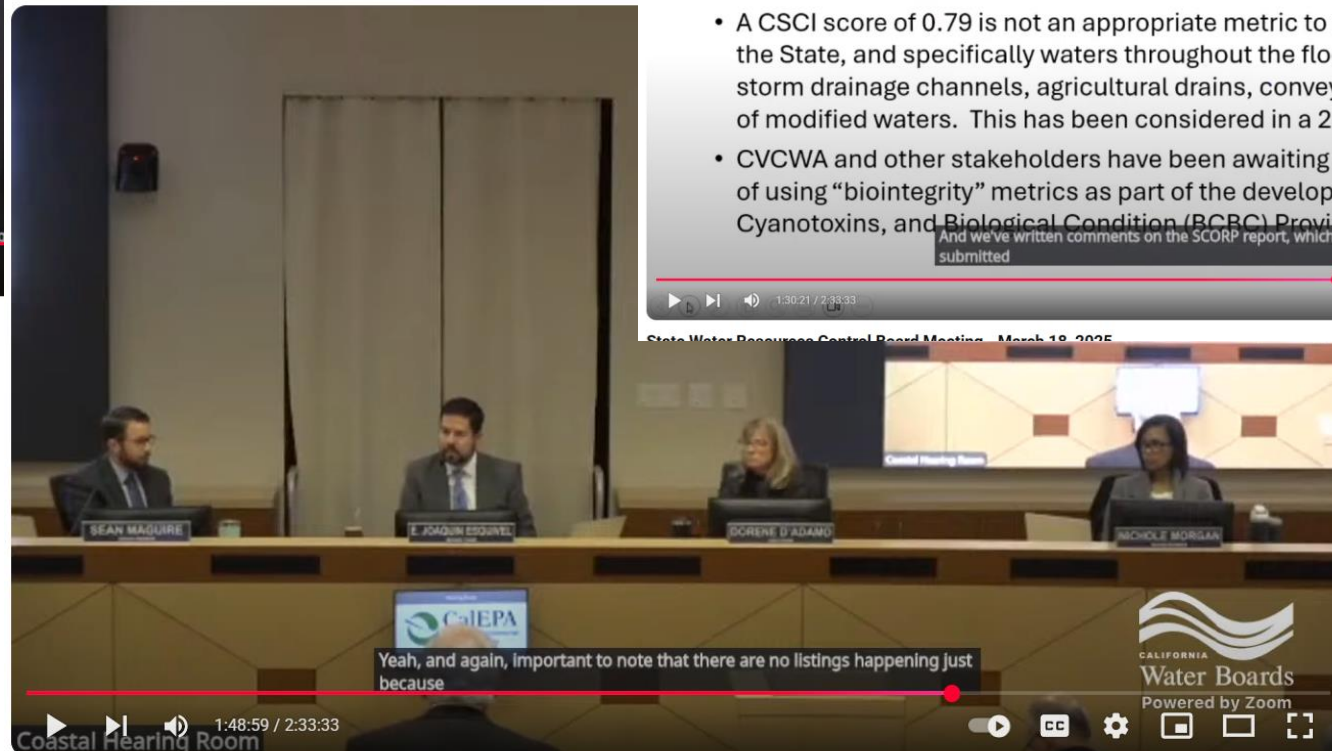
What Do We Do?

- **Central Valley Regional Water Quality Control Board**
 - Permit Review
 - Delta Mercury Control Program Phase 2 TMDL
 - Pyrethroid Research Plan
 - Delta Regional Monitoring Program Policies and Actions
 - Basin Planning Priorities
- **State Water Resources Control Board**
 - Integrated Report/303(d) List
 - Water Quality Enforcement Policy
 - Biostimulatory, Cyanotoxin, and Biointegrity Conditions Provisions for Wadeable Streams of California and the Ocean Acidification and Hypoxia Program.
 - Site Specific Objectives for Copper and Zinc
 - Bay-Delta Plan
 - Clean Water State Revolving Fund
 - MCLs (Hex Chrom, PFAS)
 - Statewide Wastewater Needs Assessment

What Do We Do?



State Water Resources Control Board Meeting - March 18, 2025



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Concerns with California Stream Condition Index (CSCI)

- CVCWA has long been concerned with the use of the benthic macroinvertebrate CSCI developed by the Southern California Coastal Water Research Program (SCCWRP) as a regulatory tool
- The CSCI score of 0.79 was developed to reflect conditions in relatively pristine waters but is now being used for “significantly degraded” and “impaired” determinations
- A CSCI score of 0.79 is not an appropriate metric to manage a variety of waters across the State, and specifically waters throughout the floor of the Central Valley, including storm drainage channels, agricultural drains, conveyance channels, and other examples of modified waters. This has been considered in a 2024 SCCWRP report.
- CVCWA and other stakeholders have been awaiting discussions on policy implications of using “biointegrity” metrics as part of the development of the Biostimulation, Cyanotoxins, and Biological Condition (BCBC) Provisions

And we've written comments on the SCORP report, which we sent to SCORP. We then submitted



Do I Want to Join the PRA Special Project?

- Do you participate in CASA's Regulatory Workgroup Meetings?
- Do you spend too many of your work hours monitoring CVRWQCB and SWRCB regulatory activities?
- Do you want changes to NPDES permitting?
- Do you want to discuss POTW regulatory issues with other agencies on a regular basis?
- Do you want to provide direction on CVCWA's priorities and regulatory advocacy?
- Do you want your agency to make comments but never want to spend resources writing the letter or going to the Board meeting?