

San Francisco Bay Regional Water Quality Control Board

July 29, 2026

TO: Dischargers List

**Subject: Review of Nutrient Watershed Permit 2025 Group Annual Report
Order R2-2024-0013, NPDES Permit CA0038873**

We reviewed the 2025 Group Annual Report, dated April 1, 2026, for the Nutrient Watershed Permit R2-2024-0013 (hereinafter, “the Order”) with a focus on Attachment 2 - Compliance Milestone Summary Report. The Bay Area Clean Water Agencies (BACWA) submitted the annual report to demonstrate the Dischargers’ compliance with the Order’s reporting requirements and interim compliance milestones described in Provision 6.3.3 Compliance Schedule Milestones and Progress Reporting, as well as other associated reporting requirements in Provisions 6.3.5-6.3.6, and Attachment E, Section 5.2.2 of the Order.

During our review, we identified some deficiencies, issues, errors, missing information, and potential discrepancies in the information reported by the Dischargers within Attachment 2 of the Group Annual Report. However, our main concern regarded reporting clarity. The key issue that this letter aims to address is that the Dischargers should either clearly demonstrate their compliance with the reporting requirements in the Order or indicate if a reporting requirement is not applicable to their facility in a reporting period rather than not addressing the reporting requirement. If a reporting requirement is not addressed, the Regional Water Board is often unable to determine whether the lack of information is due to deficient reporting or the inapplicability of a requirement. Additionally, per Provision 6.3.3.3 of the Order, the Dischargers are explicitly required to identify their compliance or noncompliance with the progress reporting requirements under the Order’s compliance schedule.

This letter outlines the reporting requirements and compliance schedule milestones in greater detail, as well as the specific deficiencies that we identified in the 2025 Group Annual Report. General feedback that applies to multiple or all Dischargers is provided within the body of the letter and Discharger-specific issues are detailed in the attachment to this letter.

Reporting Requirements and Compliance Schedule Milestones

Provision 6.3.3 of the Order includes annual reporting requirements to be submitted by the Dischargers individually or through a Group Annual Report, including the following:

1. Provision 6.3.3.1 requires a summary of progress (i.e., the “Progress summary” compliance milestone in the attached table) toward the total inorganic nitrogen

DONALD YOUNG, CHAIR | EILEEN M. WHITE, EXECUTIVE OFFICER

final effluent limitations, including actions taken to reduce total inorganic nitrogen loads, in accordance with the specific milestones listed in Table 5.

2. Provision 6.3.3.2 requires a summary of any changes to the project plans or schedules communicated in a Discharger's previous reporting, along with rationale for those changes (i.e., the "Summary of changes and their rationale" compliance milestone in the attached table) and any additional projects or plans needed for nitrogen reductions if the current plans will not achieve the final effluent limitations (i.e., the "Summary of any additional plans to meet final effluent limits" compliance milestone in the attached table).
3. Provision 6.3.3.3 requires a notification of compliance or noncompliance with Provision 6.3.3 for each Discharger listed in Table 4 of the Order (i.e., the "Notification of compliance or noncompliance" compliance milestone in the attached table).

In addition, Table 5 of the Order required that the Dischargers perform an alternatives analysis and identify a project or projects that would best achieve compliance with the final effluent limits (i.e., the "Alternative analysis" compliance milestone in the attached table) and provide optimization schedules (i.e., the "Optimization schedule" compliance milestone in the attached table) with the 2025 Group Annual Report, due April 1, 2026:

Perform Alternatives Analysis. Dischargers shall evaluate the compliance alternatives and identify which alternative or combination of alternatives (i.e., compliance pathway) best achieves compliance with the final effluent limitations in Table 4.

If a Discharger has already identified a compliance pathway, the Discharger shall provide a status update regarding implementation.

If a Discharger plans to meet the final effluent limits in Table 4 solely or in part through treatment optimization, it shall include a schedule to complete the optimization portion of the work no later than May 1, 2028, and begin implementation in accordance with its schedule.

Provisions 6.3.5, 6.3.6, and Attachment E, Section 5.2.2 of the Order include other reporting requirements to be satisfied with each Group Annual Report.

- Attachment E, Section 5.2.2.1 specifically requires the Dischargers to document annually their compliance with Provisions 6.3.3, 6.3.5, and 6.3.6, as well as Provisions 6.3.2, which includes requirements to support monitoring, modeling, and science plan development.
 - To document compliance with Provision 6.3.2, Dischargers are required to submit certification that they provided adequate support (i.e., contributed its portion of the required contribution) to monitoring, modeling, and subembayment studies.
 - Provision 6.3.5 requires Dischargers who identify long-term multi-benefit solutions, including water recycling and nature-based solutions, that will not be completed by the effective date of the final effluent limitations in the Order to report on such projects annually. Of the Dischargers that the Regional Water Board is aware of that are evaluating or pursuing

qualifying long-term multi-benefit solutions that may result in total inorganic nitrogen loads at or below the final effluent limitations in the Order, all have provided adequate status updates with the 2025 annual report to comply with this requirement.

- Provision 6.3.6 includes criteria that Dischargers must meet to be considered “early actors” for the purposes of the Order. Those Dischargers are required by Provision 6.3.3.1 to provide annual status updates on project implementation in lieu of reporting on the specific compliance schedule milestones in Table 5 of the Order described above. This topic is discussed in greater detail in the “Early Actors” section, below.
- Attachment E, Sections 5.2.2.2 through 5.2.2.5 includes specifications about the data that the Dischargers must submit annually and the required format for that data. The Dischargers have satisfied these reporting requirements in other portions of the 2025 Group Annual Report.

The Dischargers have failed to demonstrate compliance with the annual reporting requirements and specific milestones described above, as follows:

- The Dischargers did not submit certification of contributions to support monitoring, modeling, and subembayment studies (Attachment E, Section 5.2.2.1 and Provision 6.3.2). Each subsequent Group Annual Report must include these certifications for each Discharger.
- Some Dischargers have indicated that they have not completed their required alternatives analyses (Table 5 of the Order).
- Some Dischargers that have indicated they have selected optimization as a component of their compliance pathway did not provide schedules for their ongoing optimization efforts (Table 5 of the Order).
- Many of the Dischargers have failed to describe whether any changes to their project plans (including project timelines) have occurred in the past year and, if changes occurred, the rationale for those changes (Provision 6.3.3.2).
- Dischargers generally did not report on whether additional nutrient reduction plans are needed to meet the final effluent limitations (Provision 6.3.3.2).
- The Dischargers have not explicitly indicated their compliance or noncompliance with the compliance schedule milestones requirements in Provision 6.3.3 (Provision 6.3.3.3). Although the Dischargers’ compliance or noncompliance with the milestones can be determined based on their responses, BACWA and the Dischargers must explicitly indicate their compliance status for each Discharger with each subsequent Group Annual Report.
- Several Dischargers claiming to be eligible pursuant to Provisions 6.3.3.1 and 6.3.6 for the “early actors” reporting requirements did not satisfy the criteria for that designation, or provided information indicating they have not yet completed a project or are not in progress of completing a project to reduce nutrients. One Discharger claimed to be eligible under Provisions 6.3.3.1 and 6.3.6 but did not provide sufficient information to verify if it satisfies the criteria for that designation. Dischargers that do not qualify under Provisions 6.3.3.1 and 6.3.6 must comply

- with the Compliance Schedule Milestones in Table 5 of the Order, rather than providing “early actor” project status updates per Provisions 6.3.3.1 and 6.3.6.
- The 2025 Group Annual Report states that the Dischargers have satisfied their reporting requirements for Attachment E, Section 5.2.2 of the Order, with Attachment 1 to the Group Annual Report. Although the Dischargers have satisfied the requirements in Sections 5.2.2.2 through 5.2.2.5 in Attachment 1, the Group Annual Report does not specifically provide certification for each Discharger that they have provided adequate support in accordance with Provision 6.3.2, and does not fully document compliance with Provisions 6.3.3, 6.3.5 and 6.3.6.

Discharger-specific feedback regarding compliance with the reporting requirements in Provision 6.3.3 is included in the attachment to this letter. Please note that there are additional comments on issues identified in the “Additional Issues Identified in the 2025 Group Annual Report” section below. Although it is important that the Dischargers review and address those issues to ensure that the Group Annual Report provides an accurate accounting of their actions to date, those items are not all related to explicit reporting requirements in the Order.

The reporting requirements identified above and compliance schedule milestones in Provision 6.3.3 are enforceable requirements of the Order. Annual reporting on these milestones is required for the Dischargers to demonstrate to the Regional Water Board, as well as the State Water Board, U.S. EPA, and to the public at large, that they are acting expeditiously to comply with the Order’s total inorganic nitrogen final effluent limitations, consistent with the State Water Board’s Compliance Schedule Policy¹, which stipulates that any valid compliance schedule must require compliance as soon as possible. It is therefore essential that the Dischargers demonstrate they are acting to comply with the effluent limitations as soon as possible, either through timely completion of the compliance schedule milestones or by explaining how alternative actions they have completed represent their greatest possible pace of implementation.

Interim requirements and dates are vital components of compliance schedules under the Compliance Schedule Policy to ensure that compliance with final effluent limitations occur as soon as possible. Therefore, failure to meet the Order’s interim milestones and progress reporting requirements potentially subjects dischargers to Water Board and third-party enforcement. Non-compliance with the compliance schedule requirements within the Order may also make it difficult for the Regional Water Board to justify a Discharger’s eligibility for a compliance schedule in future permit reissuances.

Early Actors

For the purposes of the Order, the “early actor” designation in Provision 6.3.6 is intended to provide alternative annual reporting requirements for dischargers that began implementing major projects designed to reduce total inorganic nitrogen loads prior to the effective date of the Order, October 1, 2024. It should be noted that capital

¹ State Water Resources Control Board. 2008. Resolution No. 2008-0025: Policy for Compliance Schedules in National Pollutant Discharge Elimination System Permits, Provision 6.a.

improvement projects to improve treatment reliability and performance are required under each individual NPDES order in Attachment D, Section 1.3 Duty to Mitigate and Section 1.4 Proper Operation and Maintenance. However, the “early actor” definition in Provision 6.3.6 of this order is limited to the “construction or implementation of projects to reduce total inorganic nitrogen discharges to San Francisco Bay,” meaning capital improvement projects designed with the intention to reduce effluent nutrient loading.

Although Provision 6.3.6 states that “...the Regional Water Board will consider available regulatory mechanisms to provide more time to comply...” for “early actors”, designation of a Discharger as an “early actor” in the Group Annual Report or verification of “early actor” status by the Regional Water Board within this letter (or both) do not guarantee that a Discharger will be eligible for additional time should the Regional Water Board take action to extend the Order’s compliance schedule timeline with future regulatory actions or provide additional time to comply with the effluent limitations in the next Nutrient Watershed Permit (or both). Rather, this designation allows the Dischargers with ongoing projects meeting the “early actor” criteria in Provision 6.3.6 to report annually on their progress toward completing those projects in lieu of completing the specific Compliance Schedule Milestones listed in Table 5 of the Order.

This purpose and the criteria for the “early actors” designation in Provision 6.3.6 were clarified in two letters that the Regional Water Board sent to the Dischargers on May 13, 2025, and May 30, 2025. In our May 30, 2025, letter, we requested that any Dischargers claiming to be “early actors” in the 2024 Group Annual Report provide specific details about their nutrient reduction projects with their 2025 Group Annual Report submittals that would enable us to verify their “early actor” status. This requested information was also outlined in the flow diagram created by BACWA and shown in Figure 1 of Attachment 2 of the 2025 Group Annual Report.

The Dischargers claiming “early actor” status were responsive to the requests in our May 2025 letters for additional information. We are grateful to the Dischargers for providing the requested details about their nutrient reduction projects with their 2025 Group Annual Report submissions. However, in some cases the information was inconsistent with the “early actor” criteria in the Order or conflicted with other information provided to us by the Dischargers.

Based on the information provided in the 2025 Group Annual Report, we are clarifying the reporting requirements for the Dischargers that self-designated as “early actors” or are currently complying with their total inorganic nitrogen final effluent limits (or both).

1. We wish to recognize the following Dischargers as currently complying with their total inorganic nitrogen final effluent limits. Not all of the following Dischargers self-designated as “early actors” within the 2025 Group Annual Report. These Dischargers should report they are currently in compliance with the final effluent limits, expect to remain in compliance (if applicable), and comply with the reporting requirements of Attachment E, Section 5.2.2.
 - Las Gallinas Valley Sanitary District
 - Crockett Community Services District

- Napa Sanitation District
 - City of Petaluma
 - Sonoma Valley County Sanitation District
 - Sanitary District No. 5 of Marin County (Paradise Cove)
 - City of American Canyon
 - Cities of San Jose and Santa Clara²
 - West County Wastewater District
 - Novato Sanitary District
 - Oro Loma Sanitary District
 - Mt. View Sanitary District
2. The following Dischargers qualify for the “early actor” reporting requirements in Provisions 6.3.3.1 and 6.3.6. These dischargers must follow the reporting requirements of Attachment E, Section 5.2.2, and Provisions 6.3.3.2, 6.3.3.3, and 6.3.5, but as stated in Provision 6.3.3.1, they must report annual status updates on project implementation rather than meet the milestones in Table 5 of the Order.
- East Bay Municipal Utilities District
 - Fairfield-Suisun Sewer District
 - City of Palo Alto
 - City and County of San Francisco – Treasure Island
 - City of San Mateo
 - City of Sunnyvale
 - Union Sanitary District
3. We need additional information from the City of Hayward to determine whether it qualifies for “early actor” reporting requirements.
4. The following Dischargers claimed the “early actor” designation, but they do not meet the Order’s definition used for the purposes of reporting requirements in Provisions 6.3.3.1 and 6.3.6 and therefore must complete the compliance milestones in Table 5 of the Order. More information is provided in the attachment.
- Dublin San Ramon Services District
 - City of Livermore
 - City of Pinole
 - City of Richmond and Richmond Municipal Sewer District
 - City and County of San Francisco – Southeast Plant
 - City of San Leandro

It has come to our attention that there is also confusion about the reporting requirements in Table 5 of the Order for the Dischargers that do not qualify for the Provision 6.3.6 “early actor” designation but have already identified a compliance pathway. The Dischargers that had already identified a compliance pathway prior to the Group Annual Report due on April 1, 2026, had an additional unique reporting requirement to provide a status update regarding implementation of their compliance

² The Cities of San Jose and Santa Clara have a unique nutrient loading situation and unique reporting requirements. Reference the attached table for more information.

pathway. This is a stand-alone requirement, and it does not preclude the other compliance schedule reporting requirements (e.g., alternatives analyses) required of those Dischargers in the Group Annual Report. We should also note that future reporting years do not have unique reporting requirements for dischargers that have selected compliance pathways.

Required Follow-Up Information

The Dischargers must provide the following supplementary information to clarify the issues we have identified above, as well as the Discharger-specific issues detailed in the attachment to this letter. The Dischargers must update the information in the 2025 Group Annual Report and provide the following, as available:

- *For Dischargers that have selected optimization as part of a compliance pathway:* Provide a schedule for the optimization portion of the work. The schedule must indicate that the optimization portion of the work will be completed no later than May 1, 2028, per the requirements in Table 5 of the Order.
- *For all Dischargers:* Indicate whether there have been any changes to project plans since the previous reporting year and provide a rationale for those changes per the requirements in Provision 6.3.3.2.
- *For all Dischargers:* Indicate each Discharger's status of compliance or noncompliance with Provision 6.3.3 per the requirements in Provision 6.3.3.3.

Additional Items and Requested Updates

In addition to the reporting requirements described above, we reviewed the 2025 Group Annual Report for readability, clarity, accuracy, and to determine the Dischargers' responsiveness to our previous requests for additional information. We have identified a few potential issues, errors, discrepancies, and other items during our review for which we are requesting updates or clarification from the Dischargers:

- **Information Inconsistencies in Attachment 2.** Some of the information provided by the Dischargers in Attachment 2, either in Table 1 or in the Detailed Responses in Table 2 (or both) appears to conflict with information provided to the Regional Water Board previously or does not include critical details. Because of this, the responses provided may give a misleading indication of the Dischargers' current and expected future compliance with the total inorganic nitrogen effluent limitations. The Dischargers should update the information provided to correct or explain any discrepancies identified in the Attachment to this letter.
- **Attachment 2, Figure 3.** It may be difficult for the readers of the Group Annual Report to understand the information being presented in Figure 3. There should be a more detailed description of the source of the information presented and what it means.
- **Project Dates.** Many dischargers did not provide project dates in Table 1 of Attachment 2 of the Group Annual Report. Current projected compliance timelines, particularly for dischargers that expect their compliance pathway to exceed 10 years, would be informative for the Regional Water Board to prepare for future permit reissuances and other potential future regulatory actions. Estimated dates for projects and compliance pathways that are still in

development are acceptable and would not be considered binding at this due date if it is made clear that they are tentative.

- **Alternative Analyses.** The Dischargers did not provide individual results from their alternatives analyses. We expected the Dischargers would provide results or reports to demonstrate ongoing compliance with the compliance schedule milestones described above. The only exceptions to this expectation would be for dischargers that qualify as “early actors” and provided a project status update, those already in compliance that expect to continue to comply with their final effluent limitations, or a unique situation in which a discharger did not need to evaluate multiple project options before selecting a compliance pathway. Without a full report, an executive summary, or a thorough description of the findings of a Discharger’s alternatives analysis, Regional Water Board staff cannot in our best professional judgement determine whether a discharger is making expeditious progress toward meeting the Order’s total inorganic nitrogen final effluent limitations.
- **Optimization Schedules.** Many of the Dischargers pursuing optimization solely or as part of their compliance pathway did not provide a detailed schedule. For those dischargers, we expected to receive a detailed set of steps planned for optimization, including a final completion date, as well as an approximation of the expected nutrient reductions achieved through optimization.

Despite these issues, we note that the status updates provided by the Dischargers in the 2025 Group Annual Report were adequately responsive to our May 2025 request that those selecting innovative technologies to meet their final effluent limitations provide timelines for pilot studies that are needed to support those projects. We appreciate the care and effort the Dischargers have taken to provide that information.

To address the items above, we request that the Dischargers update the information in the 2025 Group Annual Report and provide the following supplemental information, as available:

- *For Dischargers that do not qualify for the “early actor” reporting requirements and have not previously provided the results of an alternatives analysis:* Provide the results of their alternatives analyses (e.g., by submitting an Alternatives Analysis Report or other form of alternatives analysis). Note that the findings are not binding as a compliance pathway for this due date.
- *For Dischargers that have selected optimization as part of their compliance pathway:* Indicate whether compliance with the final effluent limitations is expected to be achieved through optimization alone.
- *For all Dischargers:* Review the general issues listed in the “Additional Issues Identified in the 2025 Group Annual Report” section above and provide additional information to address the issues, errors, and discrepancies identified (e.g., ensure that the information in Table 1 of the Attachment 2 is consistent with the detailed responses in Table 2 of Attachment 2 and other information provided separately to the Regional Water Board).
- *For Dischargers that have not strictly complied with the compliance schedule requirements detailed in this letter:* Provide an explanation of how their actions to

date indicate that they are acting to comply with their final effluent limitations as soon as possible.

Discussion

In some situations, the Dischargers have provided the required or requested information described above in earlier Group Annual Reports or in other documentation provided to the Regional Water Board under this Order, previous orders, or other associated requests for information. In many such instances, the Dischargers did not provide sufficient references within the 2025 Group Annual Report to the information they have previously provided to enable efficient review of their past and current compliance with the Order. This is concerning because these reports are public documents that are reviewed by a variety of interested parties who may not be familiar with previous reports or in receipt of information provided in other formats and forums.

Based on the above, each Group Annual Report should be submitted as a standalone document. The responses provided by Dischargers should summarize information provided in past reports or other formats that is essential to a reader's understanding of the new information provided. Alternatively, Dischargers' responses may include clear references to previous reports that contain information that is critical to understanding what is being reported, as well as the location within those reports where the information can be found and how the public can access those documents, to enable interested parties to critically review the Dischargers' compliance with the Order requirements. Although this is not explicitly required by the Order, it will help ensure that the Group Annual Reports provide thorough and transparent documentation of actions taken to comply with the Order's requirements and facilitate review by the Regional Water Board and external parties.

We appreciate your attention to this letter and request a response that addresses the deficiencies identified above as soon as practicable. If you have any questions regarding this letter, please contact Kerry O'Connor at Kerry.OConnor@waterboards.ca.gov and Aidan Cecchetti at Aidan.Cecchetti@waterboards.ca.gov.

Sincerely,

Eileen M. White, P.E., Executive Officer

Copy (sent by email):

Julie Song, U.S. EPA, Region 9, song.julie@epa.gov

Lorien Fono, Bay Area Clean Water Agencies, Ifono@bacwa.org

CW-858381

Attachment: Discharger-Specific Feedback on Attachment 2 – Compliance Milestone Summary Report

Discharger	Required Reporting and Compliance Milestones (Bold = Missing)	Description of Feedback
<i>American Canyon, City of</i>	<i>Currently Compliant</i>	<i>No individual feedback.</i>
Benicia, City of	Progress summary Alternatives analysis Optimization schedule Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	<u>Summary</u>: The Discharger indicated that ongoing optimization projects may achieve compliance with the final effluent limitations and provided sufficient detail on ongoing optimization efforts. However, optimization does not preclude the alternatives analysis due date, and an update on the analysis was missing from the report because the Discharger stated that the alternatives analysis is expected to be completed in 2026. If the Discharger completed a previous alternatives analysis for its nutrient reduction projects, or if this requirement does not apply to the Discharger, it should include that information with the annual report. <u>Required Items</u>: The Discharger must: (1) complete its alternatives analysis or submit the results from a previously completed alternatives analysis, and (2) submit a notification of compliance or noncompliance. <u>Requested Items</u>: We request that the Discharger submit the findings from its alternative analysis once complete.
Burlingame, City of	Progress summary Alternatives analysis Optimization schedule Summary of changes and their rationale	<u>Summary</u>: The Discharger has stated that it has completed an alternatives analysis, but that a final alternative has not been selected. The Discharger reported in the 2024 Group Annual Report that piloting of optimization efforts may be needed to see if it will meet the final effluent limitations, and it included a potential start date for piloting with this annual report. The Discharger included a list of potential plans to meet final effluent limits with the 2024 Group Annual Report.

Discharger	Required Reporting and Compliance Milestones (Bold = Missing)	Description of Feedback
	Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	The Discharger did not include a summary of progress completed over the past year, excluding the compliance schedule milestones. If the Discharger did not perform additional actions beyond the compliance schedule milestone, it must indicate so. The Discharger indicated that it may not complete its optimization efforts before May 1, 2028. As part of its required progress summaries and summaries of changes and their rationale in future annual reports, the Discharger must provide annual updates on its optimization schedule if it continues to project that the optimization schedule will exceed the May 1, 2028, deadline, and it should provide explanations for the scheduling delays. The Discharger did not include a summary of changes to its schedules or plans previously reported to the Regional Water Board. If it did not make any changes, it should include a statement that the requirement does not apply. <u>Required Items:</u> The Discharger must: (1) complete its alternatives analysis by selecting a final alternative, (2) provide a schedule with an estimated completion date for optimization, (3) provide a summary of progress completed over the past year, (4) provide a summary of changes to its schedules or plans previously reported to the Regional Water Board, and (5) submit a notification of compliance or noncompliance. <u>Requested Items:</u> We request that the Discharger: (1) submit the findings of the alternatives analysis, and (2) provide estimated project start and end dates.

Discharger	Required Reporting and Compliance Milestones (Bold = Missing)	Description of Feedback
Central Contra Costa Sanitary District	Progress summary Alternatives analysis Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	<u>Summary</u>: The Discharger provided a detailed status update, but it did not include results from its alternatives analysis or a summary of any changes in plans or schedules from information previously submitted to the Regional Water Board. If these requirements do not apply to the discharger, it should include an explanation with the annual report. <u>Required Items</u>: The Discharger must: (1) provide a summary of changes to its schedules or plans previously reported to the Regional Water Board, and (2) submit a notification of compliance or noncompliance. <u>Requested Items</u>: We request that the Discharger: (1) submit the findings of its alternatives analysis, and (2) provide estimated project start and end dates.
Central Marin Sanitation Agency	Progress summary Alternatives analysis Optimization schedule Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	<u>Summary</u>: The Discharger provided a status update on its alternatives analysis, which began in 2024 but has not been completed. The Discharger indicated that optimization may be pursued as part of its compliance pathway and indicated it would be completed by May 1, 2028, if selected. The Discharger did not include a summary of changes to its schedules or plans previously reported to the Regional Water Board. If it did not make any changes, it should include a statement that the requirement does not apply. <u>Required Items</u>: The Discharger must: (1) complete its alternatives analysis, (2) provide a summary of changes to its schedules or plans previously reported to the Regional Water Board, and

Discharger	Required Reporting and Compliance Milestones (Bold = Missing)	Description of Feedback
		(3) submit a notification of compliance or noncompliance. <u>Requested Items</u>: We request that the Discharger: (1) submit the findings from its alternative analysis once complete, and (2) provide estimated project start and end dates.
<i>Crockett Community Services District</i>	<i>Currently Compliant</i>	<i>No individual feedback.</i>
Delta Diablo	Progress summary Alternatives analysis Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	<u>Summary</u>: The Discharger's detailed response in Table 2 indicates that it has identified a compliance pathway and provides a status update on the nutrient reduction projects it is undertaking. The Discharger did not indicate whether it has completed an alternatives analysis. If these requirements do not apply to the discharger, it should include an explanation with the annual report. <u>Required Items</u>: The Discharger must: (1) complete its alternatives analysis or demonstrate it has already been completed, and (2) submit a notification of compliance or noncompliance. <u>Requested Items</u>: We request that the Discharger submit the findings from its alternative analysis.
East Bay Dischargers Authority (EBDA)	Progress summary Notification of compliance or noncompliance	<u>Summary</u>: The Discharger collects and discharges effluent from multiple other dischargers, which are collectively required to comply with a single overall nutrient effluent limitation. Each discharger is pursuing projects on an individual basis, as described below, and EBDA as a whole is considering additional nutrient reduction opportunities including the First Mile Horizontal Levee, which is a nature-based solution. The Discharger provided an overall status update.

Discharger	Required Reporting and Compliance Milestones (Bold = Missing)	Description of Feedback
		<u>Required Items</u>: The Discharger must submit a notification of compliance or noncompliance.
City of Hayward (EBDA)	Progress summary Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	<u>Summary</u>: The Discharger provided a project status update. If the Discharger would like the “early actor” compliance schedule reporting requirements rather than the reporting requirements in Table 5 of the Order, it needs to further explain which specific parts of its project were underway prior to the October 1, 2024, effective date of the Order. Our records on the Discharger’s project are outdated and do not provide clear evidence to confirm that the Discharger’s project was already in progress on October 1, 2024. The Discharger submitted conflicting information on its estimated project completion dates between Table 1, Table 2, and previous information submitted to the Regional Water Board. The Discharger did not include a summary of changes to its schedules or plans previously reported to the Regional Water Board. If it did not make any changes, it should include a statement that the requirement does not apply. <u>Required Items</u>: The Discharger must (1) either provide sufficient information to justify that it qualifies for “early actor” requirements or demonstrate it completed an alternatives analysis and follow the reporting requirements of Table 5 of the Order for all future compliance milestones, (2) provide a summary of changes to its schedules or plans previously reported to the Regional Water Board, and (3) submit a notification of compliance or noncompliance.

Discharger	Required Reporting and Compliance Milestones (Bold = Missing)	Description of Feedback
		<u>Requested Items</u>: If the Discharger does not submit sufficient information to justify that it qualifies for the “early actor” reporting requirements of Provisions 6.3.3.1 and 6.3.6, we request that the Discharger submit the findings from its alternative analysis.
City of San Leandro (EBDA)	Progress summary Alternatives analysis Optimization schedule Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	<u>Summary</u>: The Discharger provided a project status update. We would like to recognize that the Discharger was proactive in evaluating nutrient removal projects for its facilities. However, the Discharger designed its project to treat 20 percent of its flow which will provide removal of approximately 20 percent of its nutrient effluent load. The Discharger will need to make significant additional reductions after its ongoing project to target 20.5 mg/L as N total inorganic nitrogen. Therefore, the Discharger must follow the compliance milestones in Table 5 of the Order. The Discharger did not include an alternatives analysis. If the Discharger completed a previous alternatives analysis for its nutrient reduction projects, or if this requirement does not apply to the Discharger, it should include that information with the annual report. The Discharger did not include a summary of any changes to its schedules or plans previously reported to the Regional Water Board. If it did not make any changes, it should include a statement that the requirement does not apply. <u>Required Items</u>: The Discharger must: (1) complete an alternatives analysis or submit the results from a previously completed alternatives analysis, and (2) submit an optimization schedule. The Discharger must also: (3) submit a summary of any changes to its schedules or plans previously reported to the Regional Water

Discharger	Required Reporting and Compliance Milestones (Bold = Missing)	Description of Feedback
		Board, and (4) provide a notification of compliance or noncompliance.
<i>Oro Loma Sanitary District and Castro Valley Sanitary District (EBDA)</i>	<i>Currently Compliant</i>	<i>No individual feedback.</i>
Union Sanitary District (EBDA)	Progress summary Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	<u>Summary</u>: The Discharger is currently undertaking a large-scale nutrient reduction project that qualifies them for “early actor” designation but may not achieve its total inorganic nitrogen final effluent limitations. The Discharger did not provide a summary of any additional plans for future projects should additional nutrient reductions be needed. The Discharger must include this information or state that it does not have any ongoing plans for additional nutrient removal. <u>Required Items</u>: The Discharger must: (1) submit a summary of any additional plans for future projects should additional nutrient reductions be needed or state it does not have any ongoing plans for potential additional nutrient removal, and (2) provide a notification of compliance or noncompliance.
Dublin San Ramon Services District (EBDA)	Progress summary Alternatives analysis Optimization schedule Summary of changes and their rationale	<u>Summary</u>: While we recognize that recycled water provides a multi-benefit solution for nutrient removal, the Discharger began recycling water in 1995, preceding the earliest Nutrient Watershed Permit and Order R2-2019-0017, which established the concept of “early actor”. The Discharger must complete an alternatives analysis to comply with the compliance schedule milestones. If these requirements do

Discharger	Required Reporting and Compliance Milestones (Bold = Missing)	Description of Feedback
	Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	not apply to the Discharger, it should include an explanation with the annual report. The Discharger did not include a summary of any changes to its schedules or plans previously reported to the Regional Water Board. If it did not make any changes, it should include a statement that the requirement does not apply. <u>Required Items:</u> The Discharger must: (1) complete an alternatives analysis. The Discharger must also: (2) submit a summary of any changes to its schedules or plans previously reported to the Regional Water Board, and (3) submit a notification of compliance or noncompliance. <u>Requested Items:</u> We request that the Discharger submit the findings from its alternative analysis.
City of Livermore (EBDA)	Progress summary Alternatives analysis Optimization schedule Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	<u>Summary:</u> While we recognize that recycled water provides a multi-benefit solution for nutrient removal, the Discharger began recycling water in the 1960s, preceding the earliest Nutrient Watershed Permit and R2-2019-0017, which established the concept of “early actor”. The Discharger did not include the findings of an alternatives analysis. If these requirements do not apply to the Discharger, it should include an explanation with the annual report. The Discharger did not include a summary of any changes to its schedules or plans previously reported to the Regional Water Board. If it did not make any changes, it should include a statement that the requirement does not apply.

Discharger	Required Reporting and Compliance Milestones (Bold = Missing)	Description of Feedback
		<u>Required Items</u>: The Discharger must: (1) complete an alternatives analysis. The Discharger must also: (2) submit a summary of any changes to its schedules or plans previously reported to the Regional Water Board, and (3) submit a notification of compliance or noncompliance. <u>Requested Items</u>: We request that the Discharger submit the findings from its alternative analysis.
East Bay Municipal Utility District	Progress summary Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	<u>Summary</u>: The Discharger did not include a summary of any changes to its schedules or plans previously reported to the Regional Water Board. If it did not make any changes, it should include a statement that the requirement does not apply. <u>Required Items</u>: The Discharger must: (1) submit a summary of any changes to its schedules or plans previously reported to the Regional Water Board, and (2) provide a notification of compliance or noncompliance.
Fairfield-Suisun Sewer District	Progress summary Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	<u>Summary</u>: The Discharger is an “early actor” and submitted a project status update in compliance with the compliance schedule requirements. We want to recognize that only the Discharger’s “Phase 1” project qualifies as an “early actor” project, not “Phase 2”. The status update describes the milestones it has already completed, expected completion dates including potential changes in its schedule, expected nutrient reductions, and additional projects it is considering. <u>Required Items</u>: The Discharger must provide a notification of compliance or noncompliance.

Discharger	Required Reporting and Compliance Milestones (Bold = Missing)	Description of Feedback
<i>Las Gallinas Valley Sanitary District</i>	<i>Currently Compliant</i>	<i>No individual feedback.</i>
<i>Marin County (Paradise Cove), Sanitary District No. 5 of</i>	<i>Currently Compliant</i>	<i>No individual feedback.</i>
Marin County (Tiburon), Sanitary District No. 5 of	Progress summary Alternatives analysis Optimization schedule Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	<u>Summary</u>: The Discharger provided a status update and indicated that it has completed an alternatives analysis in August 2025 and will pilot technologies during 2026 to support selection of a final alternative. The Discharger did not include a summary of any changes to its schedules or plans previously reported to the Regional Water Board. If it did not make any changes, it should include a statement that the requirement does not apply. The Discharger indicated that it may pursue optimization as “Alternate 1”, but it did not provide an optimization schedule. The Discharger must submit an optimization schedule. If it does not choose optimization as a compliance pathway, an optimization schedule is not required. <u>Required Items</u>: The Discharger must: (1) submit an optimization schedule, (2) submit a summary of any changes to its schedules or plans previously reported to the Regional Water Board, and (3) provide a notification of compliance or noncompliance. <u>Requested Items</u>: We request that the Discharger: (1) submit the findings from its alternative analysis, and (2) provide estimated project start and end dates.

Discharger	Required Reporting and Compliance Milestones (Bold = Missing)	Description of Feedback
Millbrae, City of	Progress summary Alternatives analysis Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	<u>Summary</u>: The Discharger did not provide the results from an alternatives analysis and has not previously reported on the initial alternatives identified. The Discharger did not include a summary of any changes to its schedules or plans previously reported to the Regional Water Board. If it did not make any changes, it should include a statement that the requirement does not apply. <u>Required Items</u>: The Discharger must: (1) complete an alternatives analysis, if not already conducted, (2) submit a summary of any changes to its schedules or plans previously reported to the Regional Water Board, (3) submit a summary of any additional plans needed to meet the final effluent limits, as relevant, and (4) provide a notification of compliance or noncompliance. <u>Requested Items</u>: We request that the Discharger: (1) submit the findings from its alternative analysis once complete, and (2) provide estimated project start and end dates.
<i>Mt. View Sanitary District</i>	<i>Currently Compliant</i>	<i>No individual feedback.</i>
<i>Napa Sanitation District</i>	<i>Currently Compliant</i>	<i>No individual feedback.</i>
<i>Novato Sanitary District</i>	<i>Currently Compliant</i>	<i>No individual feedback.</i>
Palo Alto, City of	Progress summary Summary of changes and their rationale Summary of any additional plans to meet final effluent limits	<u>Summary</u>: The Discharger is an “early actor” and submitted a project status update in compliance with the compliance schedule requirements. The status update describes the milestones it has already completed, expected completion dates for its ongoing projects, and overall nutrient reductions.

Discharger	Required Reporting and Compliance Milestones (Bold = Missing)	Description of Feedback
	Notification of compliance or noncompliance	The Discharger did not include a summary of any changes to its schedules or plans previously reported to the Regional Water Board. If it did not make any changes, it should include a statement that the requirement does not apply. <u>Required Items:</u> The Discharger must: (1) submit a summary of any changes to its schedules or plans previously reported to the Regional Water Board, and (2) provide a notification of compliance or noncompliance.
<i>Petaluma, City of</i>	<i>Currently Compliant</i>	<i>No individual feedback.</i>
Pinole, City of	Progress summary Optimization schedule Alternatives analysis Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	<u>Summary:</u> We recognize that the Discharger completed a major treatment upgrade project in 2020. However, the Regional Water Board required the Discharger to complete the aforementioned project in its individual Order R2-2018-0004, Table 7, to increase the Discharger's hydraulic capacity with the intent of reducing blending events and uses of its emergency outfall. The "early actor" reporting requirements, are specified in Provision 6.3.3.1 for dischargers meeting the criteria in Provision 6.3.6, which is limited to those undertaking projects designed to reduce inorganic nitrogen loads rather than general facility improvements. The Discharger did not include the findings of an alternatives analysis. If these requirements do not apply to the Discharger, it should include an explanation with the annual report. The Discharger did not include a summary of any changes to its schedules or plans previously reported to the Regional Water Board. If it did not make any changes, it should include a statement that the requirement does not apply.

Discharger	Required Reporting and Compliance Milestones (Bold = Missing)	Description of Feedback
		<u>Required Items</u>: The Discharger must: (1) complete its alternatives analysis or indicate it has already completed one, (2) submit a summary of any changes to its schedules or plans previously reported to the Regional Water Board, and (3) provide a notification of compliance or noncompliance. <u>Requested Items</u>: We request that the Discharger submit the findings from its alternative analysis once complete.
Rodeo Sanitary District	Progress summary Alternatives analysis Optimization schedule Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	<u>Summary</u>: The Discharger nearly complied with its final effluent limits in 2025, but it noted in its status update that the current operations may not be the preferred method of nutrient removal for future years. The Discharger did not include the findings of an alternatives analysis. If these requirements do not apply to the Discharger, it should include an explanation with the annual report. <u>Required Items</u>: The Discharger must: (1) complete an alternatives analysis, if not completed already, or submit the results from a previously completed alternatives analysis (2) submit a schedule for its optimization project, if relevant, and (3) provide a notification of compliance or noncompliance. <u>Requested Items</u>: We request that the Discharger: (1) submit the findings from its alternative analysis once complete, and (2) provide estimated project start and end dates.
San Francisco (San Francisco International Airport), City and County of	Progress summary Alternatives analysis Summary of changes and their rationale	<u>Summary</u>: The Discharger provided a status update on its ongoing work on a new advanced water treatment facility, which was initiated in 2025 and will be completed in 2027.

Discharger	Required Reporting and Compliance Milestones (Bold = Missing)	Description of Feedback
	Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	The Discharger did not include the findings of an alternatives analysis. If the Discharger completed a previous alternatives analysis for its nutrient reduction project, or if this requirement does not apply to the Discharger, it should include an explanation with the annual report. The Discharger did not include a summary of any changes to its schedules or plans previously reported to the Regional Water Board. If it did not make any changes, it should include a statement that the requirement does not apply. The Discharger did not provide a summary of any additional plans for future projects should additional nutrient reductions be needed. The Discharger must include this information, or state that it does not have any ongoing plans for additional nutrient removal. <u>Required Items</u>: The Discharger must: (1) complete an alternatives analysis, if not completed already, or submit the results from a previously completed alternatives analysis, (2) provide a summary of any changes to its schedules or plans previously reported to the Regional Water Board, (3) provide a summary of any additional plans for future projects should additional nutrient reductions be needed, and (4) provide a notification of compliance or noncompliance. <u>Requested Items</u>: We request that the Discharger submit the findings from its alternative analysis once complete.
San Francisco (Southeast Plant), City and County of	Progress summary Alternatives analysis	<u>Summary</u>: The Discharger did not initiate construction or implementation of projects to reduce total inorganic nitrogen discharges associated with the Southeast Plant prior to the effective date of the Order. Therefore, the Discharger does not

Discharger	Required Reporting and Compliance Milestones (Bold = Missing)	Description of Feedback
	Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	meet the criteria for the reporting requirements of Provisions 6.3.3.1 and 6.3.6 for the Southeast Plant. The Discharger stated that work completed to reduce nutrients in discharges from its Treasure Island facilities should result in the “early actor” reporting requirements being applied to all its facilities because it has a single rate-payer base. However, the Southeast Plant and Treasure Island facilities discharge at different locations and are assigned separate effluent limitations. The reporting requirement for one facility cannot be applied to the other facility unless the Discharger can demonstrate that the early actions taken at one facility result in significant progress being made toward meeting both facilities’ combined effluent limitations as clarified in our May 13 and May 30, 2025, letters. Therefore, if the Discharger intends for the work completed across both its Southeast Plant and Treasure Island plant to be considered as if it were a single system, the Discharger would need to demonstrate that the project at the Treasure Island plant makes substantial progress toward compliance with the combined nutrient effluent limitations for both facilities. The upgrades at the Treasure Island plant, which are expected to reduce total inorganic nitrogen discharges from that facility to 8 mg N/L, will not achieve a significant nutrient reduction when compared to the combined loading final effluent limit of 3,321 kg N/day. The Treasure Island plant’s final effluent limit is 21 kg/day, which is less than 1% of the overall limit. As a result, if Treasure Island and the Southeast Plant were considered a single system, neither would qualify for “early actor” reporting requirements.

Discharger	Required Reporting and Compliance Milestones (Bold = Missing)	Description of Feedback
		The Discharger stated that its alternatives analysis is expected to be completed by the end of 2027. The Discharger must submit the results of its alternatives analysis. The Discharger did not include a summary of any changes to its schedules or plans previously reported to the Regional Water Board. If it did not make any changes, it should include a statement that the requirement does not apply. <u>Required Items</u>: The Discharger must: (1) complete an alternatives analysis. The Discharger must also: (2) submit a summary of any changes to its schedules or plans previously reported to the Regional Water Board, and (3) provide a notification of compliance or noncompliance. <u>Requested Items</u>: We request that the Discharger submit the findings from its alternative analysis, once complete.
San Francisco (Treasure Island), City and County of	Progress summary Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	<u>Summary</u>: The Discharger is eligible for “early actor” status for the Treasure Island facility on an individual basis. The Discharger provided a sufficient status update regarding ongoing work at the facility. The Discharger did not include a summary of any changes to its schedules or plans previously reported to the Regional Water Board. If it did not make any changes, it should include a statement that the requirement does not apply. <u>Required Items</u>: The Discharger must: (1) submit a summary of any changes to its schedules or plans previously reported to the Regional Water Board, and (2) provide a notification of compliance or noncompliance.

Discharger	Required Reporting and Compliance Milestones (Bold = Missing)	Description of Feedback
San Jose and Santa Clara, Cities of	Progress summary Alternatives analysis Optimization schedule Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	<u>Summary:</u> The information in the Discharger’s submission differed significantly from information provided in the previous annual report and previous communications with the Regional Water Board. Notably, the Discharger previously reported to the Regional Water Board that its digested sludge dewatering project may bring the Discharger out of compliance with its final effluent limits, and that the Discharger plans to complete a traditional treatment nutrient reduction project to meet its final effluent limitation. The Discharger did not include information about this potential issue in this report, and it did not include a summary of any changes to its schedules or plans previously reported to the Regional Water Board. The Discharger must provide a summary of any changes to its plans or schedules and the rationale for those changes. The Discharger submitted the results of its alternatives analysis with the 2024 Group Annual Report. <u>Required Items:</u> The Discharger must: (1) submit a summary of any changes and their rationale, (2) submit a summary of any additional plans needed to meet its final effluent limits, and (3) submit a notification of compliance or noncompliance.
San Mateo, City of	Progress summary Summary of changes and their rationale Summary of any additional plans to meet final effluent limits	<u>Summary:</u> The Discharger claimed status as an “early actor”. We agree. However, the Discharger did not include a summary of any changes to its schedules or plans previously reported to the Regional Water Board. If it did not make any changes, it should include a statement that the requirement does not apply.

Discharger	Required Reporting and Compliance Milestones (Bold = Missing)	Description of Feedback
	Notification of compliance or noncompliance	<u>Required Items</u> : The Discharger must: (1) submit a summary of any changes and their rationale, as relevant, and (2) submit a notification of compliance or noncompliance.
Sausalito-Marín City Sanitary District	Progress summary Alternatives analysis Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	<u>Summary</u> : The Discharger did not include the findings of an alternatives analysis. If these requirements do not apply to the Discharger, it should include an explanation with the annual report. The Discharger did not include a summary of any changes to its schedules or plans previously reported to the Regional Water Board. If it did not make any changes, it should include a statement that the requirement does not apply. The Discharger did not provide a summary of any additional plans for future projects should additional nutrient reductions be needed. The Discharger must include this information or state that it does not have any ongoing plans for additional nutrient removal. <u>Required Items</u> : The Discharger must: (1) complete an alternatives analysis, if not completed already, (2) submit a summary of any changes to its schedules or plans previously reported to the Regional Water Board, (3) provide a summary of any additional plans for future projects should additional nutrient reductions be needed, and (4) provide a notification of compliance or noncompliance. <u>Requested Items</u> : We request that the Discharger: (1) submit the findings from its alternative analysis once complete, and (2) provide estimated project start and end dates.
Sewerage Agency of Southern Marin	Progress summary Alternatives analysis	<u>Summary</u> : The Discharger provided a brief analysis of alternatives that it identified and is currently evaluating but did not complete its

Discharger	Required Reporting and Compliance Milestones (Bold = Missing)	Description of Feedback
	Optimization schedule Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	alternatives analysis. The Discharger also included a discussion of ongoing optimization efforts and its schedule for completing them. The Discharger did not include a summary of any changes to its schedules or plans previously reported to the Regional Water Board. If it did not make any changes, it should include a statement that the requirement does not apply. <u>Required Items:</u> The Discharger must: (1) complete its alternatives analysis, (2) submit a summary of any changes to its schedules or plans previously reported to the Regional Water Board, and (3) provide a notification of compliance or noncompliance. <u>Requested Items:</u> We request that the Discharger: (1) submit the findings from its alternative analysis once complete, and (2) provide estimated project start and end dates.
Silicon Valley Clean Water	Progress summary Alternatives analysis Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	<u>Summary:</u> The Discharger provided an update on the status of the alternatives that were selected. The Discharger did not include a summary of any changes to its schedules or plans previously reported to the Regional Water Board. If it did not make any changes, it should include a statement that the requirement does not apply. <u>Required Items:</u> The Discharger must: (1) provide a summary of any changes to its schedules or plans previously reported to the Regional Water Board, and (2) provide a notification of compliance or noncompliance. <u>Requested Items:</u> We request that the Discharger provide estimated project start and end dates.

Discharger	Required Reporting and Compliance Milestones (Bold = Missing)	Description of Feedback
<i>Sonoma Valley County Sanitation District</i>	<i>Currently Compliant</i>	<i>No individual feedback.</i>
South San Francisco and San Bruno, Cities of	Progress summary Alternatives analysis Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	<u>Summary</u>: The Discharger provided a status update on its alternatives analysis but did not indicate that the analysis has been completed. The Discharger must submit the results of its alternatives analysis. The Discharger did not include a summary of any changes to its schedules or plans previously reported to the Regional Water Board. If it did not make any changes, it should include a statement that the requirement does not apply. <u>Required Items</u>: The Discharger must: (1) complete its alternatives analysis, and (2) provide a notification of compliance or noncompliance. <u>Requested Items</u>: We request that the Discharger: (1) submit the findings from its alternative analysis once complete, and (2) provide estimated project start and end dates.
Sunnyvale, City of	Progress summary Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	<u>Summary</u>: The Discharger claimed status as an “early actor”; we agree. The Discharger submitted a project status update in compliance with the compliance schedule requirements. The Discharger did not include a summary of any changes to its schedules or plans previously reported to the Regional Water Board. If it did not make any changes, it should include a statement that the requirement does not apply. <u>Required Items</u>: The Discharger must: (1) submit a summary of any changes and their rationale, as relevant, and (2) submit a notification of compliance or noncompliance.

Discharger	Required Reporting and Compliance Milestones (Bold = Missing)	Description of Feedback
Vallejo Flood and Wastewater District	Progress summary Alternatives analysis Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	<u>Summary</u>: The Discharger provided the key outcomes from its alternatives analysis (i.e., its selection of a recommended alternative) and provided a status update on its project. The Discharger did not include a summary of any changes to its schedules or plans previously reported to the Regional Water Board. If it did not make any changes, it should include a statement that the requirement does not apply. <u>Required Items</u>: The Discharger must: (1) provide a summary of any changes to its schedules or plans previously reported to the Regional Water Board, and (2) provide a notification of compliance or noncompliance. <u>Requested Items</u>: We request that the Discharger provide estimated project start and end dates.
West County Common Outfall – City of Richmond and Richmond Municipal Sewer District	Progress summary Alternatives analysis Optimization schedule Summary of changes and their rationale Summary of any additional plans to meet final effluent limits Notification of compliance or noncompliance	<u>Summary</u>: We recognize that the Discharger substantially completed a major treatment upgrade project in 2024. However, the Regional Water Board required the Discharger to complete the aforementioned project in its individual Order R2-2019-0003, Table 5, and R2-2024-0008, Table 3, to improve treatment reliability and reduce total suspended solids and biochemical oxygen demand effluent limit violations. Provision 6.3.6 is limited to Dischargers undertaking projects designed to reduce inorganic nitrogen loads rather than general facility improvements. The Discharger has stated that it is working with Veolia on an updated Master Plan that will include a nutrient management strategy, but it has not demonstrated expeditious efforts toward identifying alternatives.

Discharger	Required Reporting and Compliance Milestones (Bold = Missing)	Description of Feedback
		The Discharger did not indicate that it has completed an alternatives analysis and has not provided an optimization schedule despite indicating that its compliance pathway would include optimization. The Discharger did not include a summary of any changes to its schedules or plans previously reported to the Regional Water Board. If it did not make any changes, it should include a statement that the requirement does not apply. <u>Required Items:</u> The Discharger must: (1) complete an alternatives analysis. The Discharger must also: (2) submit an optimization schedule, (3) submit a summary of any changes to its schedules or plans previously reported to the Regional Water Board, (4) provide a summary of any additional plans needed to meet the final effluent limits, and (5) provide a notification of compliance or noncompliance. <u>Requested Items:</u> We request that the Discharger submit the findings from its alternative analysis, once complete.
West County Common Outfall – West County Wastewater District	Currently Compliant	No individual feedback.