



## IRVINE RANCH WATER DISTRICT

15600 Sand Canyon Avenue • P.O. Box 57000 • Irvine, California 92619-7000 • (949) 453-5300 • [www.irwd.com](http://www.irwd.com)

September 29, 2010

Ms. Katherine Hart  
Chair, Central Valley Regional Water Quality Control Board  
Sacramento Office  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6114

RE: National Pollutant Discharge Elimination System (NPDES) Permit, Sacramento Regional County Sanitation District - APPROVE DRAFT RECOMMENDATION

Dear Ms. Hart:

On behalf of the Irvine Ranch Water District, I urge you to adopt the draft Waste Discharge Requirements for the Sacramento Regional County Sanitation District. The new restrictions will require Sacramento Regional to meet strict new standards for ammonia and pathogens. This updated NPDES Permit for Sacramento Regional is vital to comprehensive solution to the Delta crisis.

The Sacramento Regional wastewater facility is the largest contributor of ammonia to the Delta. This facility not received the upgrades necessary to provide advanced forms of wastewater treatment to remove ammonia and pathogens; treatment that is commonplace in Southern California. There is a growing body of scientific evidence pointing to ammonia as one of the stressors contributing to the current ecological crisis in the Delta. These studies report that ammonia alters the food web in ways that give non-native species an advantage while harming native species. Removal of ammonia prior to discharge can help reduce ammonia's negative impacts in the Delta. Further, by removing pathogens from Sacramento Regional's waste discharge streams, recreational uses in the Delta and drinking water uses further downstream will be protected.

As you know, more than 25 million Californians rely on water supplies from the Sacramento-San Joaquin Delta. IRWD gets approximately 20 percent of its water supply from imported sources – both from the Colorado River and from the Delta. The Delta currently faces unprecedented restrictions due to endangered species such as the Delta Smelt. Communities and farms across the state lost access to more than 600,000 acre-feet of water supplies this year. This is equivalent to all the water demand in the Sacramento region. This water supply is at risk until a comprehensive solution to the Delta crisis is underway. Updating Sacramento Regional County Water Sanitation District's Waste Discharge Permit is a key element of that solution.

Irvine Ranch Water District: Sacramento Regional Sanitation District updated NPDES Permit –  
Adopt Draft Recommendations  
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Achieving the co-equal goals of ecosystem restoration and water supply reliability established in the package of Delta and water legislation enacted in November 2009 will require a comprehensive strategy. Adoption of the draft recommendation for the Sacramento Regional County Sanitation District's NPDES permit requiring reductions in ammonia and pathogen discharge is a critical step to making this goal a reality. It is for these reasons that IRWD respectfully requests that you adopt the draft Waste Discharge Requirements for the Sacramento Regional County Sanitation District. If we can be of further assistance, please do not hesitate to contact me at (949) 453-5310. Thank you for your attention to this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul D. Jones II". The signature is written in a cursive, flowing style.

Paul D. Jones II  
General Manager