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October 5, 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

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**RE: National Pollutant Discharge Elimination System (NPDES) Permit  
Sacramento Regional County Sanitation District  
APPROVAL OF STAFF RECOMMENDATION**

Dear Ms. Hart:

The upcoming decision by the Central Valley Regional Water Quality Control Board on the NPDES Permit for the Sacramento Regional County Sanitation District facility effects the future of Municipal Water District of Orange County (MWDOC), the 28 cities and retail water agencies that it serves, and the more than two-million Orange County residents who depend on the water that they receive from the Sacramento-San Joaquin Delta.

This water supply faces unprecedented restrictions due to endangered species such as the Delta Smelt. Communities and farms across California have lost access to more than 600,000 acre-feet of water this year – which is equivalent to the total water demand of the Sacramento region. Not only are there endangered species issues affecting this water supply but other environmental, governance, economic, and water quality issues as well. The water supplies for 25 million Californians will remain at risk until these issues are addressed through a comprehensive solution to the Delta crisis. A key element of that solution is an updated NPDES Permit for the Sacramento Regional County Sanitation District that will help improve Delta water quality.

As you are aware, this wastewater facility is the largest contributor of ammonia to the Delta and is the largest that has yet to undergo an upgrade to an advanced form of wastewater treatment, which is commonplace for similar facilities in southern California. We agree with the Regional Board staff that the growing body of scientific evidence points to ammonia as one of the stressors that is contributing to the ecological crisis in the Delta by altering the food web in ways that advantage non-native species and disadvantage species such as Delta Smelt. We concur with the staff recommendation for ammonia removal treatment. We also agree with the

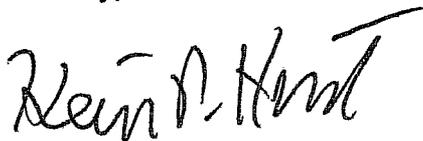
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**Municipal Water District of Orange County**  
**NPDES Permit for Sacramento Regional County Sanitation District**  
**October 5, 2010**  
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recommendation of the Regional Board staff and the California Department of Public Health that pathogens be removed from the facility's discharge stream. Pathogen removal is critically important for downstream recreational and drinking water use. Additionally, we agree with the comments submitted by the State Water Contractors on this matter and urge the Board to factor them into its final decision.

Finally, it is important to note that southern California water uses will likely bear billions of dollars in additional costs in the coming years as our region works to secure a more reliable water supply from the State Water Project. This will require a comprehensive approach to addressing the myriad of challenges affecting this water supply source – including the reduction in ammonia as part of a nutrient management strategy – and achieving California's co-equal goals of ecosystem restoration and water supply reliability in the Delta. We firmly believe that the adoption of this key NPDES permit is a critical step in making that goal a reality.

Sincerely,

A handwritten signature in black ink that reads "Kevin P. Hunt". The signature is written in a cursive, slightly slanted style.

Kevin P. Hunt, P.E.  
General Manager