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**CITY HALL**

1110 West Capitol Avenue  
West Sacramento, CA 95691

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West Sacramento, CA 95691  
(916) 617-4850

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October 8, 2010

Kathleen Cole Harder  
Regional Water Quality Control Board, Central Valley Region  
11020 Sun Center Dr., Suite #200  
Rancho Cordova, CA 95670

Subject: Sacramento Regional County Sanitation District  
Tentative NPDES Permit

Dear Ms. Harder:

The City of West Sacramento appreciates the opportunity to comment on Sacramento Regional County Sanitation District's (SRCSD) Tentative Discharge Permit (Tentative Permit). As you are aware, the City of West Sacramento is a contributing agency to the SRCSD and as such, we have a vested interest in the regulatory actions and outcome that would result if the Regional Water Quality Control Board (RWQCB) were to adopt the tentative permit as proposed.

The Tentative Permit requires complete removal of ammonia and nitrates, and introduces new limits on pathogens (*Giardia* and *Cryptosporidium*). These requirements are of particular concern to the City of West Sacramento as they exceed limits applied elsewhere in the state, and may go beyond "reasonable and necessary" as required by the Clean Water Act.

If the Tentative Permit is adopted, SRCSD would be required to install new treatment technologies in order to meet these new discharge requirements. These technologies, including nitrification, de-nitrification, microfiltration and UV disinfection, are estimated at \$2 billion in capital costs with an additional \$70 million in annual operating and maintenance costs. These costs, if borne by the region's rate payers would result in the tripling of sewer use rates and connection fees skyrocketing over 4.5 times their current level. The resulting impact to the local economy could be devastating, especially in these already tough economic times.

The City of West Sacramento supports RWQCB interests in protecting the water quality and ecosystem of the Sacramento-San Joaquin Delta. As such, it is imperative that regulatory requirements be based on sound science and proven environmental benefit. In the case of the proposed ammonia limit, there is tremendous debate on whether ammonia discharges from the SRCSD treatment plant are directly linked to the decline in the delta ecosystem. In the case of the proposed pathogen limits, this would mean treating the wastewater to the same standard as drinking water, then discharging the treated water to a water body in which background levels already exceed the pathogen limits.

Thank you for the opportunity to comment on the Tentative Permit. We urge the RWQCB to reexamine the Tentative Permit and attempt to balance the competing and but equally serious impacts to the region and revise the permit limits to keep with the spirit and tenants of the federal Clean Water Act.

Sincerely,

A handwritten signature in black ink, appearing to read 'Toby Ross', with a stylized flourish at the end.

Toby Ross  
City Manager