



The Oaks Community Association

5607 Jackson Valley Road • Lone, CA 95640-9629

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October 15, 2013

State of California
Regional Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670
Attn: Josh Palmer

Re: City of Jackson Application to Renew Waste Water Discharge Permit

As you are aware, The Oaks Community owns and operates its own water treatment plant. We currently operate a treatment level 4 ozone plant. We obtain our raw water from Jackson Valley Irrigation District (JVID) which uses Lake Amador as their domestic water source. As such we are concerned with the quality of the water in Lake Amador.

Lake Amador is fed by Jackson Creek. The City of Jackson uses Jackson Creek to discharge effluent from the City's wastewater treatment facility. The discharge permit issued by the Department of Public Health for the City of Jackson restricts the discharge of effluent to 5% of the total volume of Lake Amador or a dilution ratio of 20:1.

The City of Jackson is in the process of renewing their discharge permit and as part of the process is asking that their discharge requirement of 20:1 be reduced to some lower unspecified amount. It is the City's position that this suggestion was initiated by an email sent to the City Manager, Michael Daley from Lea Walker, Chief of Environmental Drinking Water for the Department of Public Health. The justification for this request was because Jackson Valley Irrigation District had established a water source for domestic water from Lake Pardee.

While it is correct to say that Jackson Valley Irrigation District has established a domestic water source from Lake Pardee, the delivery of that treated water has not been secured for all the domestic water users currently using Lake Amador as their domestic water source. Until the entire Jackson Valley irrigation District water project is complete, which will include a treatment facility as well as a delivery system, Lake Amador will continue to remain a source of domestic water for residents of the Oaks as well as other residents and visitors of Lake Amador. Jackson Valley Irrigation District has completed phase one of their project which includes delivery of water from Lake Pardee, building the first of two water treatment plants, and servicing a small population near the treatment plant. Phase two of the project will encompass delivery and distribution of the treated water to the majority of the population in Jackson Valley, including residents of the Oaks Community.



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Our major concerns at The Oaks are centered on the issue of quality of the raw water currently in Lake Amador and the timeline for the City of Jackson's wastewater project.

There is a reason for the restrictions placed on the discharge permit for the City of Jackson. The level of organic and inorganic solids registered at Lake Amador is currently extremely high. Because of the high levels of organic and inorganic solids the raw water from Lake Amador is compromised and is considered unsuitable as a domestic water source. This situation is evidenced by communications from the Department of Public Health stating that a cleaner more suitable water source needs to be sought out by the Oaks Community as well as Jackson Valley Irrigation District.

If additional effluent is allowed to be discharged into Jackson Creek and the dilution ratio is decreased, this will further compromise the already inadequate domestic water supply delivered to the Oaks water treatment facility. If the dilution ratio is decreased and additional organic and inorganic are introduced into Lake Amador via Jackson Creek residents of the Oaks will also be required to shoulder the additional cost of treating poor quality water to a standard that will allow domestic consumption.

We are asking that the Department of Public Health and The Regional Water Quality Control Board require the City of Jackson to consider other alternatives for the discharge of their effluent. It is our opinion that it is unconscionable for the City of Jackson to disregard the quality of water being sent downstream for other communities to consume. It seems their only concern is finding a solution to their problems without regard to the impact on others.

The estimate for completion of the JVID water project is projected to be within the next 36 months. This timeline is dependent on obtaining grant funding for completion of phase two of the project. We know that the Department of Public Health is supporting this project. That being said we also know that funding has not been guaranteed and may not be available when needed.

Our question then becomes what happens to the City of Jackson's project and or permit if funding to complete phase two of the JVID water project is not attained by JVID? Will the City of Jackson be allowed to increase the discharge of effluent? Or, what happens if the City is ready to increase the effluent discharge before the JVID water project is operational?

We are asking that you clarify these issues by placing restrictions on the permit which would not allow additional discharge until the JVID water project is complete, operational, and servicing the Oaks Community.

Additionally, our understanding of the Jackson Valley Irrigation water project is that once the treatment system is operational and the distribution system is completed, JVID is identifying Lake Amador as a secondary source of domestic water to be used in an emergency. If this is the situation even once the JVID water project is completed Lake Amador will still be considered a domestic water source and should be carefully regulated.



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We thank you for your time and for reviewing our concerns. Should you have any additional questions or would like to speak to our staff regarding our concerns, please contact Terri Bailey, Park Administrator for the Oaks Community Association at (209)274-6056, or email parkadmr.toca@volcano.net.

Respectfully,

Rickie Brown
President
The Oaks Community Association
5607 Jackson Valley Road
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CC: Michael Daly, City of Jackson,
Steve Fredicks, Jackson Valley Irrigation District