



Department of Utilities
Office of the Director

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April 1, 2010

Ms. Katherine Hart, Chair
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670

Re: Comments on the "Basin Plan Amendment for the Control of Methyl and Total Mercury in the Sacramento-San Joaquin Delta Estuary" Regarding the City of Sacramento Combined Sewer System

Dear Ms. Hart:

The City appreciates the efforts made by the Regional Water Board and its staff to improve the process that has been used in the development of the Delta Mercury Total Maximum Daily Load (TMDL) and associated Basin Plan Amendment (BPA). As a result of this process, the current draft BPA addresses many of the previous concerns however several still remain to be resolved.

The City of Sacramento supports the comments submitted by the Sacramento, Contra Costa County, and Stockton stormwater programs regarding the latest draft of the BPA. In particular, the City shares the same concern for the CSS regarding the proposed "Exposure Reduction Program". We urge the revision of this language to clearly provide the option for implementing a local outreach effort or for participating in a statewide program, and delete any language assigning responsibility to dischargers for reduction of risk. Dischargers can provide outreach as has been done in the past for other statewide efforts such as the State General Construction and Industrial permits.

In addition, the City shares the same concerns voiced by the Central Valley Clean Water Agencies (CVCWA) regarding the BPA with regards to CSS discharges. The CSS is a very limited seasonal discharge, typically discharging during four days out of a given year. As such, we agree with the recommended language submitted by CVCWA for interim dischargers. We recommend



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the language for Interim Limits for NPDES Wastewater Dischargers be revised on page BPA-4 as suggested by CVCWA for consideration of site specific discharge conditions.

Thank you for this opportunity to comment on the public review draft BPA. We sincerely appreciate your consideration of our comments and thoughtful revision of the current BPA to address these concerns.

Sincerely,



Marty Hanneman, P.E.
Director, Department of Utilities