



HP Hood LLC Six Kimball Lane Lynnfield, MA 01940 (617) 887-3000

October 8, 2010

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

Re: Concern over impacts from the CVRWQCB's draft permit recommendations

Dear Ms. Harder:

I am writing on behalf of HP Hood LLC to express our concern over the Central Valley Regional Water Quality Control Board's (CVRWQCB) recent draft permit recommendations. Implementation of the "Tentative Discharge Permit" would have a significant impact on our business as well as others' in an already difficult economic environment. Furthermore, the proposed permit would do great damage to the region's nascent economic recovery and poses a formidable barrier to future economic development in the region.

HP Hood's Sacramento processing facility manufactures ultra-pasteurized, branded dairy and non dairy beverages and provides HP Hood with the valuable capability for serving customers west of the Rockies. The plant currently employs 55 union and nonunion employees and is in the process of undergoing significant renovations to expand and improve our processing and warehouse capabilities. If implemented, the proposed permit would increase Hood's monthly sewer rate four-fold and place a tremendous burden on our business from a cost competitiveness standpoint. Future plans for expansion of our facility in Sacramento, including plans to hire 30 - 40 union employees in 2011, will have to be carefully considered should our business be impacted by the CVRWQCB draft permit recommendations.

The recommendations proposed by CVRWQCB are unreasonably burdensome to businesses like ours and the requirement for ammonia removal and microfiltration goes beyond what is "reasonable and necessary" under the federal Clean Water Act. Furthermore, the cost to the region's businesses and individual tax payers is not appropriately balanced or justified against the uncertain improvements to the environment or public health. Strong scientific evidence of the benefits of the proposed recommendations is needed before making such an important and potentially highly impactful policy decision. The scientific understanding of the ecological

benefits of the proposed improvements is still uncertain and the major elements of a comprehensive Delta solution are still being formulated by state and federal agencies.

On behalf of HP Hood LLC, I would like to express our concern over the CVRWQCB's draft permit recommendations. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Michael Newell". The signature is written in a cursive style with a large, stylized initial "M".

Michael Newell
Director of Business Development
HP Hood LLC / Sacramento Facility
8340 Belvedere Ave.
Sacramento, CA 95826