



Established in 1918 as a public agency
Coachella Valley Water District

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June 5, 2012

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Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100



Dear Ms. Townsend:

Subject: Comments regarding A-2144(a)(b) at the July 18 Board Workshop

While millions of dollars are spent formulating viable ways to rescue the Delta's fragile ecosystem, Sacramento Regional County Sanitation District (SRCSD) continues to discharge dangerous pathogens and hazardous levels of ammonia, nitrates and other contaminants into its waterways. As the best and brightest minds work to develop innovative techniques to address a plethora of critical concerns threatening to disrupt water deliveries to 25 million residents, SRCSD continues to use antiquated treatment before discharging more wastewater into the Delta than any other entity.

The status quo is not acceptable. The Coachella Valley Water District — hundreds of miles away but still partly dependent upon the Delta to meet its water management needs — encourages the State Water Resources Control Board (SWRCB) to adopt — with some minor modifications¹ — the staff-produced draft order that will require SRCSD to meet more stringent permit conditions. The staff draft mostly upholds the permit issued by the Central Valley Regional Water Quality Control Board (CVRWQCB), a permit that features critical measures that mandate that SRCSD implement a much-needed, long overdue treatment plant upgrade.

SRCSD discharges enough poorly treated wastewater to place at risk the health of significant portions of the Delta ecosystem, along with millions of acre-feet of water used locally and throughout California for drinking and other domestic uses, recreation, agriculture, other industrial uses and a myriad of environmental purposes. The sanitation district currently contributes to the decline of the Delta and the quality of the water that flows through it. This must stop; not 10 years from when this workshop occurs, now.

¹ The final order needs to affirm the permit's 10 mg/L nitrate effluent limit without a mixing zone. If SWRCB remands the permit's nitrate limit to CVRWQCB for reassessment, the final order should direct it to consider adverse effects of nitrate and nitrogen to all beneficial uses, including the aquatic ecosystem and nuisance conditions in municipal and agricultural water delivery systems.



Jeanine Townsend
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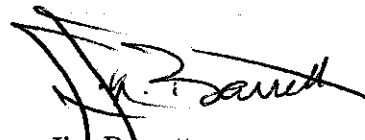
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Decades of regulatory work, research and study demonstrate that only by addressing *all* factors that adversely affect the Delta ecosystem — including wastewater discharges — is it possible to achieve lasting results. All whose actions affect the Delta must contribute to its restoration. All who benefit from the Delta's existence must be a participant in the development of solutions to what threatens its existence.

The permit's expectations of SRCSD are reasonable, fair and attainable.

Thank you in advance for your consideration.

Yours very truly,



Jim Barrett
Acting General Manager

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JP/ComLeg/2012/June/Townsend-Comments on A-2144a&b-7-18-12 Board Workshop