



## Association of California Water Agencies

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June 13, 2011

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
P.O. Box 100  
Sacramento, CA 95814



Via email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Subject: Comments to A-2144(a)(b) -- Sacramento Regional Wastewater Treatment Plant  
July 18 Board Workshop

Dear Ms. Townsend:

The Association of California Water Agencies (ACWA) urges the State Water Resources Control Board (State Water Board) to adopt the staff Draft Order, with some minor modifications, regarding permit conditions for the Sacramento Regional County Sanitation District's (SRCSD) wastewater treatment plant. We are pleased to see that the State Board staff draft largely upholds the permit issued by the Central Valley Regional Water Quality Control Board (Regional Board). ACWA previously submitted comments to the Regional Water Board supporting adoption of its order.

ACWA is a diverse statewide association of nearly 450 public water agencies that provide approximately 90 percent of the water consumed throughout the state for agricultural, urban, and commercial and industrial purposes. Our members include agencies located above, within and below the Delta. As we all are aware, the Bay-Delta is the hub of California's water supply, serving more than twenty-five million Californians. The Bay-Delta ecosystem is widely recognized as being in crisis. Based on the best available science, numerous factors ("stressors") are contributing to this crisis and the associated decline in pelagic organisms' populations (pelagic organism decline; "POD"). There is growing scientific evidence that one of the significant factors contributing to POD is increased nutrient loading, which adversely impacts the Delta food chain. The SRCSD is the largest discharger of wastewater into the Delta. It is also one of the few remaining dischargers in the region that has yet to upgrade to advanced treatment technologies.

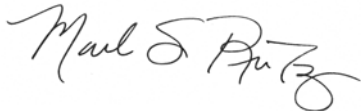
Maintaining a high-quality source supply is fundamental for sound water management. Many organizations and state and federal agencies have voiced concerns regarding SRCSD's current practices. For example, in 2010, the California Department of Public Health expressed to the Regional Board its well-reasoned concerns about the untreated pathogens that are presently contained in the discharge from this facility. Removing pathogens from this wastewater stream is a basic requirement for human health protection, both for recreational purposes in the Delta as well as for downstream drinking water uses.

The Draft Order properly finds that the permit limits on ammonia and pathogens are supported by the administrative record and applicable law.

While ACWA recognizes that the SRCSD will require time to implement the needed upgrades, we are concerned that a decade-long compliance period is too long to reduce ammonia discharges that are currently contributing to the decline of the Delta ecosystem and associated species' populations. We encourage the Regional Board and State Water Board to work with the SRCSD to identify opportunities to shorten the ten-year compliance period. Regardless of the time it takes to complete the upgrades, given the magnitude of ongoing impacts to the Delta ecosystem, the State Water Board should prohibit any increase in concentration or loading of ammonia over the current levels during the interim period.

Thank you for your consideration.

Sincerely,



Mark S. Rentz  
Director of Regulatory Affairs  
Association of California Water Agencies

cc:

Paul S. Simmons, Esq.  
Theresa A. Dunham, Esq.  
Cassie N. Aw-Yang, Esq.  
Somach Simmons & Dunn  
500 Capitol Mall, Ste. 1000  
Sacramento, CA 95814  
[psimmons@somachlaw.com](mailto:psimmons@somachlaw.com)  
[tdunham@somachlaw.com](mailto:tdunham@somachlaw.com)  
[cawyang@somachlaw.com](mailto:cawyang@somachlaw.com)

Ms. Katherine Hart, Chair  
Central Valley RWQCB  
Sacramento Office  
11020 Sun Center Drive, Ste. 200  
Rancho Cordova, CA 95670-6114  
c/o [kharder@waterboards.ca.gov](mailto:kharder@waterboards.ca.gov)

Bill Jennings, Executive Director  
California Sportfishing Protection Alliance  
3536 Rainier Avenue  
Stockton, CA 95204  
[deltakeep@aol.com](mailto:deltakeep@aol.com)