

AMBAG

ASSOCIATION OF MONTEREY BAY AREA GOVERNMENTS

August 16, 2004

Mr. Matthew Keeling, P.E.
CRWQCB – Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

RE: Draft Waste Discharge Requirements Order No.R3-2004 –0099 (NDDES Permit No. CAO049964) for the South County Regional Wastewater Authority

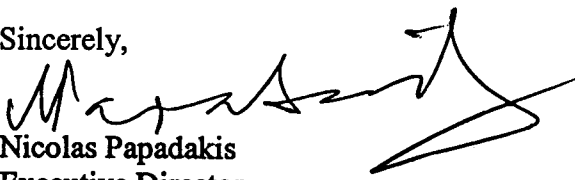
Dear Mr. Keeling:

At their August 11, 2004, meeting the Board of Directors of the Association of Monterey Bay Area Governments asked me to voice the Board's strong opposition to the above referenced permit. The basis for AMBAG's opposition to the discharge of tertiary-treated wastewater to the Pajaro River during the months of November through April continues to be the direct impact to Pajaro Valley residents and the lower Pajaro River environment, potential flood issues, and surface and groundwater degradation. The matter has also never been discussed at the Pajaro River Watershed Flood Prevention Authority, an entity charged with developing collaborative solutions from the four counties and flooding matters originating throughout the watershed.

In addition to the primary concern of the proposed discharge's impact on possible flooding, concerns also persist about probable degradation of surface water quality, groundwater quality, and about the fate of chemicals retained by fine grained sediments in the river channel or lagoon. The proposed discharge requirement order suggests surface water quality degradation of the Pajaro River from effluent. Impacts to the lagoon or estuarine water quality are under analyzed and no water or sediment quality monitoring appears to be required.

We urge the Regional Water Quality Control Board - Central Coast Region to reject subject permit.

Sincerely,


Nicolas Papadakis
Executive Director

cc: AMBAG Board of Directors
Monterey County Board of Supervisors
San Benito County Board of Supervisors
Monterey County Water Resources Agency

Santa Cruz County Board of Supervisors
Pajaro Valley Water Management Agency
City of Watsonville