



October 8, 2010

Kathleen Cole Harder  
Regional Water Quality Control Board - Central Valley Region  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, California 95670

Re: Sacramento Regional County Sanitation District Draft Discharge Permit

Dear Ms. Harder,

Brookfield was recently made aware of the draft permit requirements and related cost implications to the existing and future citizens of the region and submit the following comments to the board for consideration:

The draft permit requirements go beyond what is "reasonable and necessary" as required by the Clean Water Act by exceeding the USEPA standards for Cryptosporidium and Giardia. There is no demonstrated health issue to require the high level of treatment (micro-filtration) proposed in the draft permit.

Implementation of the draft permit requirements will further the severe economic recession the region is currently experiencing. The impact fees assessed to new homes would increase by \$27,550 per home, a 470% increase over the current fee, which equates to an annual increase of \$1,775 in the homeowners mortgage. This is in addition to the monthly fees paid in the utility bill.

The sewer utility rates will triple and existing citizens would be forced to pay an additional \$500 per year. The trickle down effects due to increased costs to businesses such as; restaurants, service stations, cleaners, food processing, etc., will also impact everyone in the region and is an additional burden that has not been quantified.

It is clear that staff, in preparing the permit, failed to analyze the effect of the permit conditions on the economic vitality of the region and its citizens. The current draft permit requirements will bring a halt to economic development of the region and much needed economic recovery.

Thank you for your consideration in this very important matter.

Sincerely,



Gonzalo Rodriguez  
Project Manager

2271 Lava Ridge Court, Suite 220, Roseville, CA 95661  
Phone 916.783.1177 • Fax 916.783.1161 • [www.brookfieldland.com](http://www.brookfieldland.com)