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September 30, 2010

Katherine Hart  
Chair, Central Valley Regional Water Quality Control Board  
Sacramento Office  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6114

**RE: National Pollutant Discharge Elimination System (NPDES) Permit  
Sacramento Regional County Sanitation District -  
APPROVE STAFF RECOMMENDATION**

Dear Ms. Hart:

The upcoming decision by the Central Valley Regional Water Quality Control Board (Regional Board) on the NPDES Permit for the Sacramento Regional County Sanitation District (SRCSD) facility has a direct impact on the future of the Calleguas Municipal Water District (Calleguas), a member agency of the Metropolitan Water District of Southern California. Calleguas is responsible for supplying potable water to more than 75% of Ventura County's population. Nearly 100% of the water we serve is imported from the Sacramento-San Joaquin Delta, through the State Water Project, a supply that now faces unprecedented restrictions due to endangered species including the delta smelt. Californians lost access to more than 600,000 acre-feet of water supplies this year, which is an equivalent supply to all the water demand of the Sacramento region.

The SRCSD facility is the largest contributor of ammonia to the Delta and is also the largest that has yet to undergo an upgrade to an advanced form of wastewater treatment, which is commonplace for similar facilities in Southern California. We agree with Regional Board staff that the growing body of scientific evidence points to ammonia as one of the stressors contributing to the current ecological crisis by altering the food web in ways that advantage non-native species and disadvantage species such as delta smelt, and we concur with the recommendation for ammonia removal treatment. Likewise, we echo the recommendations of Regional Board staff and the California Department of Public Health to remove pathogens from the SRCSD facility's discharge stream. Pathogen removal is important for recreational uses downstream as well as for downstream drinking water uses.

Calleguas supports this action by the Regional Board. Southern California water customers likely face billions of dollars of additional costs in the coming years in the hopes of regaining a reliable water supply from the State Water Project. However, it will take a comprehensive approach, including the reduction in ammonia as part of a nutrient management strategy, to achieve California's co-equal goals of ecosystem restoration and water supply reliability in the Delta. The adoption of this key NPDES permit is a critical step in making this goal a reality.

Sincerely,

A handwritten signature in black ink that reads "Eric Bergh".

Eric Bergh  
Acting General Manager

cc: Board of Directors, Calleguas MWD