

Via Electronic Mail

October 8, 2010

Kathleen Harder  
Regional Water Quality Control Board  
Central Valley Region  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670-6114  
[kharder@waterboards.ca.gov](mailto:kharder@waterboards.ca.gov)

**Subject: Tentative Waste Discharge Requirements Renewal (NPDES No. CA0077682) for Sacramento Regional County Sanitation District and Sacramento Regional Wastewater Treatment Plan, Sacramento County**

Dear Ms. Harder:

The City of Davis appreciates the opportunity to provide comments on the proposed permit renewal for the Sacramento Regional County Sanitation District (SRCSD). As a member of the Central Valley Clean Water Association, Davis supports the association's detailed comments regarding the Tentative Permit. I am writing separately to comment regarding the information regarding tertiary treatment costs in the Tentative Permit. (Fact Sheet at F-92-F-93).

It is important to place the information for the City of Davis in context. First of all, Davis has not actually constructed the facilities that are included in the \$140 million cost estimate. The \$140 million is a planning level estimate, which the City is continuing to refine. The cost estimate does not represent the required capital expenditures and financial burden imposed upon Davis residents to achieve compliance with the permit issued to the City by the Central Valley Regional Water Quality Control Board (CVRWQCB). The City's permit would require construction of entirely new secondary treatment facilities, additional solids handling processes, the introduction of advanced tertiary treatment and other substantial facility improvements. As you may know, it is also necessary for the City to invest equivalent capital into improving potable water supplies in order to achieve compliance with specific imposed NPDES permit limitations. It is not clear that Davis will be pursuing construction of the treatment train represented by this cost figure. Upon learning the significant burden such a project would impose upon the City's residents and ratepayers, the Davis City Council directed staff to explore other alternatives that would avoid the need to complete the tertiary upgrade and treatment plant replacement. The City continues to maintain that the staggering level of investment represented by the \$140 million estimate is not reasonable. Not only is the City faced with extraordinarily high potential water and wastewater infrastructure

investments,, the City does not view the \$2,200 “per capita” cost shown in the table to be reasonable nor to provide a basis for comparison with SRCSD’s anticipated costs.

The City of Davis believes it is misleading to identify these planning level cost estimates for replacement of the existing treatment plant with an entirely new state of the art facility as a “tertiary conversion” cost. We request that reference to the City of Davis be removed from the table, or that the table be deleted.

Thank you for consideration of our comments.

Sincerely,

Keith A. Smith  
Utilities Engineer

cc. Bob Clarke, Interim Public Works Director