

*Agricultural Council of California  
California Cotton Ginners and Growers Associations  
California Farm Bureau Federation  
California Poultry Federation  
Western Growers Association  
Western United Dairymen*

October 8, 2010

Ms. Katherine Hart, Chair  
**c/o Kathleen Harder**  
Central Valley Regional Water Quality Control Board  
Sacramento Office  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6114

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

Dear Ms. Hart:

The undersigned farming organizations urge the Central Valley Regional Water Quality Control Board to approve the Tentative Order to require Sacramento Regional County Sanitation District (SRCSD) to implement advanced treatment of their wastewater.

As you know, 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. This is not just a Sacramento issue. This permit is critical to the health of the Delta ecosystem. This permit is also a vital issue for family farmers who are dependent on the Delta for conveyance of their water supplies. More than 25 million Californians also depend on the Delta as a source of drinking water, including many in our region.

Maintaining a high-quality source supply is fundamental for sound water management. The Tentative Order correctly describes the growing list of emerging science showing that ammonia and other pollutants have significantly altered the Delta's food web – contributing to the overall decline of the estuary's health. Regulatory agencies have taken severe action against the state and federal water projects – slashing water exports from the Delta in an attempt to revive fish populations. It's clear though that the only way to make long-term improvements is to address all the factors that impact the Delta ecosystem – including limiting the amounts of ammonia and other contaminants that are allowed to flow into the Delta and its waterways.

Given the growing body of evidence that current ammonia discharge levels are having a detrimental effect on the Delta ecosystem, we urge the Regional Board not to adopt the interim ammonia limits in the Tentative Order that would allow a significant increase in ammonia loading over the next ten years. Instead, the Regional Board should approve interim ammonia limits prohibiting any increase in concentration or loading over current levels.

Farming and business organizations, public agencies and leaders throughout the state have been working diligently towards a comprehensive solution to the overall Delta crisis. Reducing ammonia, pathogens and other contaminants in the Delta is critical to that effort, which is why it is essential that your Board adopt the Tentative Order with more stringent interim ammonia limits.

Thank you for your consideration.

Sincerely,



Emily Rooney  
Agricultural Council of California



Bill Mattos  
California Poultry Federation



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Dave Puglia  
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