

**From:** Stephen Green [REDACTED]  
**To:** <info5@waterboards.ca.gov>  
**Date:** 10/8/2010 4:51 PM  
**Subject:** Letter to James D. Marshall

October 8, 2010

James D. Marshall, P.E.  
Senior Engineer  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, #200,  
Rancho Cordova, California 95670-6114

RE: Tentative Waste Discharge Requirements for the Sacramento Regional County Sanitation District Wastewater Treatment Plant.

I am writing in support of the Regional Board's tentative decision to require significant upgrades of the treatment of effluent discharged into the Sacramento River by the Sacramento Regional County Sanitation District Wastewater Treatment Plant. This decision is long overdue.

I am greatly concerned, however, that the Regional Sanitation District would be given ten years to bring the treatment process into compliance with the new discharge requirements. Due to the nature of the toxic concentrations of effluent currently being discharged, the District should be required to expedite the upgrades.

Waste water discharged into the bottom of the Sacramento River from the Elk Grove plant reaches the surface of the river after traveling only a few hundred feet – posing a risk of exposure to pollution by wildlife, swimmers, boaters, people fishing, birders, and others utilizing the river bank. The effluent currently being discharged contains live pathogens including giardia and cryptosporidium that can sicken river users. At times, odors below the treatment plant discharge point can be overwhelming.

The Sacramento Regional County Sanitation District presently discharges secondary-level treated wastewater to the Sacramento River within the Sacramento-San Joaquin Delta.

Along with a host of issues, a major concern is the Regional Sanitation District's discharge of undiluted effluent containing ammonia and other chemicals at toxic concentrations.

Data indicates that the treatment plant discharges approximately 14 TONS OF AMMONIA DAILY into the Sacramento River. Nearly 90 percent of the ammonia in Delta waters comes from this one plant. The ammonia toxicity has been documented by numerous acute toxicity violations, studies by Regional Board scientists and by independent researchers.

These studies demonstrate that ammonia toxicity has affected and continues to affect the food web of the lower Sacramento River and portions of The Delta. Both acute and chronic toxic effects have been identified with young Chinook salmon, steelhead, Delta Smelt and numerous other species of fish. Acute ammonia toxicity is represented by death of the indicator species. Chronic ammonia toxicity is represented by effects on fish early life stages, continued growth, reproduction and survival of indicator fish species.

Also affected is the food web such as species of copepods, important food organism for the young of many fishes and invertebrates. Numerous studies were conducted between the treatment plant's point of discharge and 30 miles downstream.

There are those who argue that more scientific investigation is needed. The facts at hand are more than adequate to require the Regional Sanitation District to take swift action to modify its waste treatment process to meet the new discharge standards. The Regional Board must provide the required oversight and enforce the State's water quality control laws.

Former legislator and Sacramento Mayor Phil Isenberg chairs the Governor's Delta Vision Blue Ribbon Task Force. He has noted that ten other sanitation plants in the region already have upgraded their operations to clean up ammonia and other pollutants.

"Most people think that polluters have a duty to cleanup up the problems they create," Isenberg said.

As the Regional Sanitation District develops its plans for upgrading the plant's operations, officials should explore creative solutions for use of their wastewater such as wetlands restoration.

I recognize that upgrading the plant will increase utility rates for households and businesses. We urge the Central Valley Board to work with the Regional Sanitation District to minimize the cost and to obtain state and federal financial assistance. The local governments served by the District also could contribute redevelopment funds to District that normally would be gifted to developers.

There is no question that the regional plant is contributing to the collapse of The Delta ecosystem. The people of California shouldn't have to wait ten years for a fix.

Sincerely,

Judith B. Green

Cc: The Hon. Roger Dickinson, Sacramento County Board of Supervisors  
The Hon. Jimmie Yee, Sacramento County Board of Supervisors  
The Hon. Susan Peters, Sacramento County Board of Supervisors  
The Hon. Roberta MacGlashan, Sacramento County Board of Supervisors  
The Hon. Don Nottoli, Sacramento County Board of Supervisors  
Stan Dean, district engineer, Sacramento Regional County Sanitation District  
Paul Hebbel, executive director, Friends of the River  
John Beuttler, executive director, California Sport Fishing Protection Alliance