

Dear Kathleen Cole Harder,

I am writing as a ratepayer and citizen to register my opposition to the new permit for the Sacramento Regional Wastewater Treatment Plant (SRWTP) at Elk Grove. I am frustrated the CRWQCB has mandated an overly stringent permit that results in extraordinary cost and cross media environmental impacts to the region, without a consensus of solid scientific evidence to support the new standards. I am urging the staff and members of the CRWQB to reconsider.

To promulgate the stringent permit requirements on the SRWTP without solid scientific evidence to support the cost increases and non-water environmental impacts is wrong. The additional treatment processes needed to meet the new permit are energy intensive and costly. At a time when there is concern about climate change and carbon footprint, and the country is in the midst of the greatest recession since the "great depression", it is questionable environmental and public stewardship to mandate such stringent standards based primarily on opinion. Because the science may take years to come up with an answer, is not a justification to mandate these new overly stringent standards.

That the CRWQCB is not sensitive to the cost implications, considering the lack of supporting scientific evidence, is disappointing. The capital facilities needed to meet the new standards are proposed to cost 2 billion. When the debt service and increased operations and maintenance cost are included, the initial costs could easily double. The resulting 300% increase in utility rates will be the hardest on those on a fixed income. Increases in the connection fees will be a hardship on the business community. To put the cost in perspective, 4 billion would support 100,000 unemployed families at the national poverty level for 2 years.

The intent is not to argue against the role of the regulatory agency in setting new standards. It is the responsibility of the CRWQCB to protect water quality. However, something is wrong with the process when overly stringent permit standards can be established on little more than professional judgment, when they create such a detrimental impact on the financial health and environment of the region.

I urge the CRWQB to reconsider the permit and base new standards on what the facts and science support.

Mike Mulkerin, P.E.

Rancho Cordova, CA.

on the basis of opinion/professional judgement that have such a detrimental impact on the financial health and environment for the region. which have such a detrimental impact on the financial health and

is incredible. I can understand when the science clearly supports the new standards how cost and cross media impacts would be considered in the balance. But in this case the mission of the CRWQCB ensure the highest water quality standards has been made in a vacuum little if any consideration to the financial impact or the resulting cross media impacts. with cost and other cross media impacts, but that is not the case with this permit. There is little more than professional judgement at best and opinion at worst supporting standards that cost and cross media impacts the standards are needed that cost should be The 2 billion for capital construction will most likely double when debt service and increase operation and maintenance cost are included. The financial impact to the business community and the residents is dramatic. The 300% increase in the sewer rates will difficult on folks who are on a fixed income, or struggling to make their mortgage payment. The increased cost will also have a detrimental effect on the business community. To put the cost into perspective the propose capital cost alone would fund XX families who are out of work for XX years.

The water board must

I do think the regulatory agencies are necessary and serve a purpose. But something is drastically wrong with the system when a single regulatory agency can invoke standards that have such a disastrous economic and cross emsuch incredibly stringent and costly standards without some formal consideratiowould be sufficient to support As a landlord with several rentals I will be unable to pass these costs on to renters who are stuggling as it is to make the rent payment. This means there will be lessTo put the cost in prespective, this As an landlord with several rentals I will not be able to pass these cost on to the renters who are already struggling with the rent. This will take away from the money to maintain the we are difficult on folks working on fixed income it will terrible burden to the business community. With the employment rate hovering in the vicinity of 10% surely there are better uses for money. the employment rate is near 10% or higher surley there is a better use for the money. increase l