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October 8, 2010

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Ms. Pamela Creedon, Executive Officer  
California Regional Water Quality Control Board – Central Valley Region  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670

*Subject: Sacramento Regional County Sanitation District - Tentative Waste Discharge Permit*

Dear Ms. Creedon:

On behalf of the City of Sacramento, I am writing to express our serious concerns over the tentative National Pollutant Discharge Elimination System (NPDES) permit for the Sacramento Regional County Sanitation District (SRCSD). We are very concerned that the new permit requires advanced treatment processes that would require an unprecedented outlay of capital and significant increases to long term operational costs without a commensurate benefit to the environment or public health. In addition, adoption of these permit requirements would have devastating impacts to our regional economy.

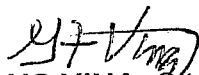
The tentative permit will require SRCSD to invest over \$2 billion into treatment facilities designed to treat wastewater constituents to levels that have not been confirmed to cause negative impacts on the Sacramento River, the Delta or public health. As acknowledged by the District, there is scientific support to reduce ammonia levels in the discharge by about one half to protect the downstream environment during rare conditions and allow for future growth. However, the permit goes beyond this sound science and requires full removal of ammonia without scientific consensus that such full scale treatment is necessary. The tentative permit would also impose new pathogen standards for the stated purpose of protecting the recreational uses downstream of the SRCSD discharge despite the fact that the Sacramento County Department of Health has found that current treatment processes are protective of public health and the proposed pathogen limitations are well beyond USEPA risk standards. This level of pathogen removal would require costly treatment plant upgrades such as energy intensive filtration processes and UV disinfection facilities. The benefits of these advanced treatment requirements are not sufficiently defined to justify the large capital investment and long term operational costs that would be incurred by SRCSD rate payers and business partners.

The City believes that prior to establishing advanced treatment requirements on individual permittees such as SRCSD, the beneficiaries of such measures, consistent with the recently adopted Delta legislation, must be clearly identified through an open process and incorporated into a plan that equitably shares the capital and operational costs of such measures. Without spreading the costs out to those who benefit, SRCSD has estimated that monthly rates would triple and construction impact fees would increase by fivefold. These significant increases will have a crippling effect on the local economy that is struggling to recover from the worst economic recession in our recent memory. The fee increases needed to meet the proposed permit's conditions will also have a ripple effect on the City's ability to raise rates needed to maintain and improve our aging water and sewer systems and the increasingly stringent regulations that accompany our obligations to maintain those systems.

As an original signatory to the Water Forum and a holder of NPDES permits for our stormwater and combined sewer systems, the City is a committed steward of our local rivers and the State's water resources. We are on record as supporters of an inclusive stakeholder process to protect the Delta and assure reliable water supplies for those within the area of origin and for those who export water from the Delta.

Thank you for the opportunity to comment on this important permit. We ask the Regional Water Quality Control Board to reconsider the advanced treatment requirements mandated by this tentative permit as there are simply too many unconfirmed assumptions to mandate such an investment and to justify such a burden on the local economy.

Sincerely,



**GUS VINA**, City Manager

cc: Kathleen Cole Harder – California Regional Water Quality Control Board – Central Valley Region  
Mayor and City Council Members

enclosure

