



October 4, 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

Dear Ms.Hart:

On behalf of the Southern California Water Committee, I 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 may know, the Southern California Water Committee, established in 1984, is a nonprofit, nonpartisan, public education partnership dedicated to informing Southern Californians about our water needs and our state's water resources. Spanning Los Angeles, Orange, San Diego, San Bernardino, Imperial, Riverside, Ventura and Kern Counties, the SCWC's members include representatives from business, government, agriculture, water agencies, labor and the general public.

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 tertiary wastewater treatment technologies. Every part of the State must do their part to help fix the Delta ecosystem. Nutrient loading into the Delta is a critical problem that needs to be addressed.

Water supplies that pass through the Delta are used by more than 25 million Californians. The water districts, businesses, farms and residents that we represent in Southern California all rely on dependable and high-quality supplies of water that pass through the Sacramento-San Joaquin River Delta.

Maintaining a high-quality source supply is fundamental for sound water management. The California Department of Public Health has relayed to you its well-reasoned concerns about the untreated pathogens that are presently contained in the discharge from this facility. Removing pathogens from this wastewater stream is a basic requirement for human health protection, both for recreational purposes in the Delta as well as for downstream drinking water uses. Downstream drinking water treatment plants rely on multiple barriers to ensure public health protection. Controlling sources of contamination is the first barrier for protecting drinking water quality and is recommended by the California Department of Public Health.

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 nitrate that are allowed to flow into the Delta and its waterways.

Given the growing body of scientific evidence that current ammonia discharge levels are having a detrimental effect on the Delta ecosystem, we urge the Regional Board to adopt interim ammonia limits in the Tentative Order that would reduce the amount of ammonia loading over the next ten years.

Organizations, public agencies and leaders throughout the state have been working diligently towards a comprehensive solution to the overall Delta crisis. We support the co-equal goals of eco-system restoration and water supply reliability and are watching closely the progress of the Bay Delta Conservation Plan effort, which is seeking to address a number of stressors on the Delta eco-system. Reducing ammonia, nitrate, and pathogens 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,



Richard W. Atwater
Executive Director