



October 5, 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 Valley Industry and Commerce Association (VICA), we 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 VICA. Water supplies moved across the Delta are used by more than 25 million Californians, including many in our region.

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.

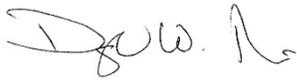
The Tentative Order correctly describes the growing list of emerging science showing that ammonia and other pollutants have significantly altered the Delta's food web – contributing to the overall decline of the estuary's health. Regulatory agencies have taken severe action against the state and federal 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 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 prohibit any increase in concentration or loading of ammonia over current levels. In addition, every effort should be made to reduce ammonia discharges in the interim period.

Organizations, public agencies and leaders throughout the state have been working diligently towards a comprehensive solution to the overall Delta crisis. 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,



Daymond Rice
2010 Chairman



Stuart Waldman
President