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Dr. Karl Longley
Central Valley Regional Water Quality Control Board
Sacramento Office
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

RE: APPROVE STAFF RECOMMENDATION: National Pollutant Discharge Elimination System (NPDES) Permit- Sacramento Regional Sanitation District

Dear Karl Longley:

Western Municipal Water District urges you and the members of the Regional Water Quality Control Board for the Central Valley to approve the staff recommendation for the NPDES permit for Sacramento Regional Sanitation District.

The upcoming Regional Board decision on the NPDES Permit for the Sacramento Regional County Sanitation District facility has a direct impact on the future of the 850,000 citizens served by Western Municipal Water District. Western imports 100 % of its retail drinking water from the sources into which this NPDES permit allows POTW discharge. In addition, communities throughout Western's 527-square mile service area in western Riverside County use water from the Sacramento Bay-Delta to recharge aquifers, blend existing groundwater, or in some cases directly serve all of the drinking water needs.

As the administrator of a regional wastewater treatment plant that disposes tertiary treated water into the Santa Ana River, Western understands the difficulties faced by Sac Regional in this NPDES permit. Decades ago, the citizens of the middle and upper sections of the Santa Ana Watershed were ordered by the Regional Board to upgrade all POTWs to tertiary standard as a prerequisite for discharge to the river. This action was costly to the communities all along the river, but the investment in a cleaner environment and healthier water supply for all downstream users has paid off.

Nearly a generation later, environmental stewards in another part of the state are realizing it is time to safeguard the ecosystem and drinking water supplies fed by the Sacramento River. The key water supply that most directly impacts drinking water quality and quantity of Western's retail water customers is impacted by discharges from the POTWS discharging into that source of supply.

Western supports safeguarding the water quality impacting the ecosystem in keeping with the co-equal goal of stable water supply in the Sacramento-San Joaquin Delta. The time has come for the Regional Board to issue an NPDES permit that reduces or eliminates discharge of ammonia and other harmful products that threaten endangered species such as delta smelt.

Communities and farms across California lost access to more than 600,000 acre-feet of water supplies this year, which is an equivalent supply to all the water demand of the Sacramento region. The water supplies for 25 million Californians will remain at risk until a comprehensive solution to the Delta crisis is under way. A key element of that solution is an updated NPDES Permit for this wastewater facility.

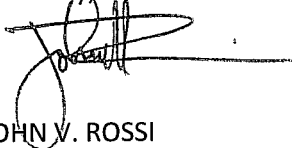
The Sacramento Regional wastewater facility is the largest contributor of ammonia to the Delta and is the largest that has yet to undergo an upgrade to an advanced form of wastewater treatment, which is commonplace for similar facilities in Southern California. Western agrees with the regional board staff that the growing body of scientific evidence points to ammonia as one of the stressors contributing to the current ecological crisis by altering the food web in ways that advantage non-native species and disadvantage species such as delta smelt, and we concur with the recommendation for ammonia removal treatment.

Western also applauds the recommendations of the Regional Board staff and the California Department of Public Health to remove pathogens from the Sacramento facility's discharge stream. Pathogen removal is important for recreational uses downstream as well as for downstream drinking water uses. The State Water Contractors have submitted comments that we also support.

Southern California water customers likely face billions of dollars of additional costs in the coming years in the hopes of regaining a reliable water supply from the State Water Project. But it will take a comprehensive approach, including the reduction in ammonia as part of a nutrient management strategy, to achieve California's co-equal goals of ecosystem restoration and water supply reliability in the Delta.

For these reasons, we urge you to adopt the staff recommendations for the Sac regional NPDES permit, which is a critical step in stabilizing not just the Central Valley ecosystem and water supply, but the majority of watersheds linked to this one, and the state as a whole.

Sincerely,

A handwritten signature in black ink, appearing to read 'John V. Rossi', with a horizontal line extending to the right.

JOHN V. ROSSI
General Manager

JR:PR