



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7  
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June 6, 2012

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
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P.O. Box 100  
Sacramento, CA 95814



Sent via email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Subject: ***Comments to A-2144(a)(b)—July 18 Board Workshop***

Dear Ms. Townsend:

Zone 7 Water Agency supports SWRCB/OCC Files A-2144(a) and A-2144(b), the State Water Resources Control Board's staff findings on review of the National Pollutant Discharge Elimination System (NPDES) permit and Waste Discharge Requirements (WDR) Order No. R5-2010-0114 (Permit) issued by the Central Valley Regional Water Quality Control Board (RWQCB) for the Sacramento Regional County Sanitation District's (SRCSD) wastewater treatment plant. Consequently, Zone 7 urges the State Water Resources Control Board (SWRCB) to adopt the Draft Order, with only minor modifications. We are pleased to see that the staff draft largely upholds the Permit issued by the RWQCB that contains critical measures that will minimize water quality degradation by requiring SRCSD to implement much-needed treatment plant upgrades.

As you know, 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 entire Delta ecosystem. It is also a vital issue for Eastern Alameda County as Zone 7 imports 80% of the water supply for over 200,000 residents and irrigation customers in this area from the State Water Project. Furthermore, water conveyed through the Delta serves the needs of more than 25 million Californians.

Maintaining a high-quality source supply is fundamental for sound water management. Many organizations and state and federal agencies have voiced concerns regarding SRCSD's current practices. In 2010, the California Department of Public Health expressed to the Central Valley Regional Water Quality Control Board its concerns about the untreated pathogens presently 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 users. Downstream drinking water treatment plants rely on

multiple barriers to ensure public health protection. Controlling sources of contamination is the first barrier.

The Draft Order properly finds that the Permit limits on ammonia and pathogens are supported by the administrative record and applicable law. For the last few decades, the state and federal water project operations have been the focus of regulatory agencies in an attempt to revive fish populations. It's now clear 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.

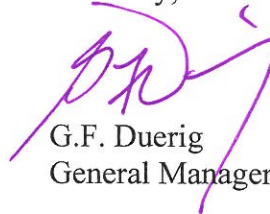
Although Zone 7 is supportive of the staff draft, there are two modifications suggested to improve it:

- The Final Order should affirm the Permit's 10 mg/L nitrate effluent limit without a mixing zone. If the SWRCB remands the Permit to the RWQCB, the Final Order should also direct the RWQCB to consider adverse impacts of nitrate and nitrogen on all beneficial uses, including the aquatic ecosystem and nuisance conditions in municipal and agricultural water delivery systems.
- Given the current state of ecological crisis in the Delta, a decade-long compliance period is too long unless the Discharger is required to carry out interim measures that will reduce ammonia loadings while the required treatment plant upgrades are planned and implemented.

A comprehensive solution to the overall Delta crisis must include reducing ammonia, nitrate and pathogens in the Delta, which is why it is essential that the State Board adopt the Draft Order, upholding the Permit approved by the Central Valley Regional Water Quality Control Board with the additional requirement to implement interim measures to reduce nitrogen discharges as quickly as possible during this ecological crisis period.

Thank you for your consideration.

Sincerely,



G.F. Duerig  
General Manager

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