

Department of Water and Power



the City of Los Angeles

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June 13, 2012

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
P.O. Box 100
Sacramento, CA 95814
Via email: commentletters@waterboards.ca.gov



Dear Ms. Townsend:

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

On behalf of the Los Angeles Department of Water and Power (LADWP), I urge the State Water Resources Control Board (SWRCB) to adopt the Waste Discharge Requirements Order No. R5-2010-0114 [NPDES No. CA0077682] for the Sacramento Regional Wastewater Treatment Plant staff Draft Order (Draft), with some minor modifications that would result in more stringent permit conditions for Sacramento Regional County Sanitation District's (SRCSD) Wastewater Treatment Plant. We are pleased to see that the Draft largely upholds the Permit issued by the Central Valley Regional Water Quality Control Board (CVRWQCB) that contains critical measures that will require SRCSD to implement much needed treatment plant upgrades.

SRCSD is the largest discharger of wastewater into the Sacramento-San Joaquin Delta (Delta) and 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 and a vital issue for the City of Los Angeles (City), which purchases about 52 percent of its water from the Metropolitan Water District of Southern California (MWD). Approximately 80 percent of purchased water, or 40 percent of the City's supply, comes from the Delta via the State Water Project (SWP). In fact, water supplies moved across the Delta are used by more than 25-million Californians, including City residents and many others in the Southern California region.

Maintaining 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 CVRWQCB its well-reasoned concerns about the untreated pathogens that are presently contained in the discharge from this wastewater treatment facility. Removing pathogens from this effluent discharge 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.

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111 North Hope Street, Los Angeles, California 90012-2607 Mailing address: Box 51111, Los Angeles 90051-5700
Telephone: (213) 367-4211 Cable address: DEWAPOLA

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The Draft 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 is now clear that the only way to make long-term improvements is to address all 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 we are largely supportive of the Draft, there are some modifications we suggest. The Final Order should affirm the Permit's 10 milligram per liter (mg/L) nitrate effluent limit without a mixing zone, which we believe is appropriate for discharges from wastewater treatment plants to sources of drinking water. If SWRCB remands the Permit's nitrate limit to the CVRWQCB for reassessment, the Final Order should direct them to consider adverse effects of nitrate and nitrogen to all beneficial uses, including the aquatic ecosystem and nuisance conditions in municipal and agricultural water delivery systems.

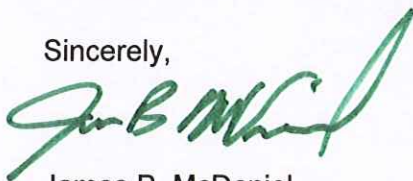
Additionally, the discharger must be required to carry out interim measures that will reduce ammonia loadings while the treatment plant upgrades, needed to fully treat ammonia, are planned and carried out. Without those interim measures, the Permit will actually allow ammonia loadings and impacts to increase.

Given the growing body of evidence demonstrating that current discharge is having a detrimental effect on the Delta ecosystem, the required treatment upgrades must occur without delay. Allowing pollutant loading to continue to increase would further compound the impacts on the Delta ecosystem. We urge SWRCB to require implementation of interim treatment measures and revisit the compliance schedule periodically, particularly for nitrogen removal.

Organizations, public agencies, and leaders throughout the state have been working diligently toward 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 uphold the Permit approved by the Central Valley Regional Water Quality Control Board and require implementation of interim measures to reduce nitrogen discharges.

Thank you for your consideration.

Sincerely,



James B. McDaniel
Senior Assistant General Manager – Water System

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Cc: Mr. David R. Pettijohn

Paul S. Simmons, Esq.
Theresa A. Dunham, Esq.
Cassie N. Aw-Yang, Esq.
Somach Simmons & Dunn
500 Capitol Mall, Suite 1000
Sacramento, CA 95814
c/o psimmons@somachlaw.com
c/o tdunham@somachlaw.com
c/o cawyang@somachlaw.com

Bill Jennings, Executive Director
California Sportfishing Protection Alliance
3536 Rainier Avenue
Stockton, CA 95204
c/o deltakeep@aol.com

Ms. Katherine Hart, Chair
Central Valley Regional Water Quality Control Board
Sacramento Office
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114
c/o kharder@waterboards.ca.gov

bc: James B. McDaniel
Mark J. Sedlacek
Cindy Montanez
Susan M. Damron
Pankaj Parekh
Melinda A. Rho
Kimberly A. Ohara