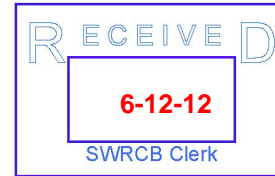




## IRVINE RANCH WATER DISTRICT

15600 Sand Canyon Avenue • P.O. Box 57000 • Irvine, California 92619-7000 • (949) 453-5300 • [www.inwd.com](http://www.inwd.com)



June 12, 2012

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
P.O. Box 100  
Sacramento, CA 95814

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:

On behalf of the Irvine Ranch Water District, I urge the State Water Resources Control Board to adopt the staff Draft Order related to the Sacramento Regional County Sanitation District's wastewater treatment plant with some minor modifications outlined below. Adoption of the draft order will result in more stringent permit conditions for the Sacramento Regional's wastewater treatment plant and will help achieve the co-equal goals of Delta ecosystem restoration and waters supply reliability.

We are pleased to see that the Draft Order largely upholds the Permit issued by the Central Valley Regional Water Quality Control Board containing critical measures that will require Sacramento Regional to implement much needed treatment plant upgrade. As you know, the Sacramento Regional 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 Permit is critical to the health of the entire Delta ecosystem, not just the Sacramento Region. Water supplies moved across the Delta are used by more than 25 million Californians. Here in the Irvine Ranch Water District, we meet approximately 27 percent of our demands with imported water from the Delta and the Colorado River.

Maintaining a high-quality source supply is fundamental for sound water management. Many organizations and state and federal agencies have voiced concerns regarding Sacramento Regional's current treatment practices. In 2010, the California Department of Public Health expressed its well-reasoned concerns about the untreated pathogens that are presently contained in the discharge from this facility to the Central Valley Regional Board. Removing pathogens from this wastewater stream is a basic requirement for protecting public health - 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 State Board's 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 is now clear that

June 12, 2012

Page 2

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 nitrates flowing into the Delta and its waterways. The permit conditions will go far in reducing discharges of ammonia and nitrates from Sacramento Regional’s wastewater treatment plant.

While we are largely supportive of the Draft Order, we respectfully request that you consider the following two modifications:

- The Final Order should affirm the Permit’s 10 mg/L nitrate effluent limit without a mixing zone. If the State Board chooses to remand the Permit’s nitrate limit to the Regional Board for reassessment, the Final Order should direct the Regional Board 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.
- The Final Order should require the discharger 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. The proposed decade-long compliance period is too long to reduce ammonia discharge impacts. Without interim measures, the Permit will actually allow ammonia loadings and impacts to increase. Given the growing body of evidence demonstrating that the 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 for another 10 years would further compound the impacts on the Delta ecosystem.

Organizations, public agencies and leaders throughout the state have been working diligently towards a comprehensive solution to the overall challenges facing the Delta. Reducing ammonia, nitrate, and pathogens in the Delta is critical to this effort, which is why it is essential that the State Board uphold the Permit approved by the Central Valley Regional Board and require implementation of interim measures and a shortened compliance schedule to reduce ammonia and nitrogen discharges. It is for these reasons that IRWD respectfully requests that the State Board adopt the Draft Order with the above proposed modifications. If we can be of further assistance, please do not hesitate to contact me at (949) 453-5590. Thank you for your consideration of this important issue.

Sincerely,



Paul Cook  
General Manager

Cc : Paul S. Simmons, Esq., Somach Simmons & Dunn  
Theresa A. Dunham, Esq., Somach Simmons & Dunn  
Cassie N. Aw-Yang, Esq., Somach Simmons & Dunn  
Bill Jennings, Executive Director, California Sportfishing Protection Alliance  
Ms. Katherine Hart, Chair, Central Valley Regional Water Quality Control Board