

FOSTERING REGIONAL ECONOMIC PROSPERITY



metrochamber

SACRAMENTO METROPOLITAN
CHAMBER OF COMMERCE

June 1, 2012

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
PO Box 100
Sacramento, CA 95812-0100



**RE: Comments on the State Water Resource Control Board's Draft Order
Regarding the NPDES Permit for the Sacramento Regional Wastewater
Treatment Plant**

Dear Water Board Members:

The Sacramento Metropolitan Chamber of Commerce appreciates the opportunity to comment on the State Water Board's Draft Order issued on May 14, 2012 pertaining to the NPDES permit that was issued for the Sacramento Regional Wastewater Treatment Plant (SRWTP) in December 2010. This matter is of utmost importance to the Sacramento region and those who are served by the Sacramento Regional County Sanitation District.

We recognize that conditions in the Sacramento-San Joaquin Delta need attention and help in balancing the co-equal goals of water supply reliability and ecosystem restoration. Stakeholders in the Sacramento region recognize the need to protect the environment, and at the same time recognize the need for economic sustainability. As our understanding of the Delta ecosystem matures, it is becoming more apparent that there is still much to learn, and there are many different factors contributing to environmental problems in the Delta. We believe that this perspective clearly calls for a balanced, incremental, and multifaceted approach to solving the Delta crisis in which we continue to learn and improve over time. Requiring massive improvements to SRWTP and the huge expense to the Sacramento region is clearly inconsistent with the adaptive management approach to addressing Delta needs.

The costs to upgrade the SRWTP in the existing permit will have substantial damaging effects on the economic vitality of businesses and residents in the Sacramento region. It is expected the capital costs for the upgrade will be about \$2 billion. This capital spending will translate into the typical single family homeowner paying about \$500 more per year and the typical neighborhood serving restaurant will see their bill triple from roughly \$650 per month to roughly \$2,000 per month. These increases will also affect the livelihood of all types of businesses in the region. We believe that economics do matter and must be considered and fairly balanced in decisions to permit our wastewater facilities. Just as the State must balance competing needs in the Delta, and the Sanitation District must balance its co-equal objectives of protecting the environment and making wastewater services affordable, the Water Boards must balance protecting the environment with the well-being of citizens.

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Roger Niello

Sacramento Metro Chamber

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As your deliberations move forward on the SRWTP permit, we strongly urge your Board to do the following:

1. In a genuine, open, and fair manner truly consider the technical, regulatory and legal arguments posed by the Sacramento Regional County Sanitation District.
2. Recognize that the economic impacts to the Sacramento Region are real and significant, and use your authority to fully consider economic impacts in your decisions.
3. Recognize the uncertainty in our scientific understanding of the Delta and the need for multifaceted and incremental approaches, and do not jump to excessive use of precaution at the expense of the Sacramento region.

Again, thank you for the opportunity to comment.

Sincerely,



Roger Niello
President & CEO

Attachment: List of Endorsements

As interested and affected stakeholders and businesses in the Sacramento region, we, the undersigned organizations, fully support the positions and principles contained in the comment letter from the **Sacramento Metro Chamber** to the **State Water Resources Control Board**, dated June 1, 2012.



County of Sacramento



City of Folsom



City of Sacramento



City of West Sacramento



City of Elk Grove



City of Rancho Cordova

Michael Ault

Downtown Sacramento Partnership

Grant Deary

Nor-Cal Beverage Co., Inc.

Bob Blymyer

Sacramento Taxpayers Association

Lynn Bohan

HP Hood, LLC

Steve Hammond

Sacramento Convention and Visitors Bureau

Mark Saposnik

Mission Linen Supply

John Costa

North State Building Industry Association

Chris Meyer

Carmichael District Chamber of Commerce

Kirk Trost

Sacramento Area Council of Governments

Bettie Cosby

Citrus Heights Regional Chamber

Daniel Conway

California Restaurant Association

Joe Gagliardi

Folsom Chamber of Commerce

Cory Koehler

**Rental Housing Association of
Sacramento Valley**

Michelle Brown

Natomas Chamber of Commerce

Teresa Stephenson

Sacramento Hotel Association

Franklin Burris

North Sacramento Chamber of Commerce

Trudi Hughes

California League of Food Processors

Jerry Vorpahl

Power Inn Alliance

Brett Buatti

Campbell Soup Company

Pat Fong Kushida

**Sacramento Asian Pacific Chamber of
Commerce**

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Azizza Davis Goines

Sacramento Black Chamber of Commerce

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Elliott Homes

Stan Dean

**Sacramento Area Sewer District &
Sacramento Regional County Sanitation District**

John Norman

Brookfield Residential Properties, Inc.

Richard A. Hale, Sr.

Walt's Auto Service

Uddhav Giri

LART Group, Inc.