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September 9, 2011

Via email: kharder@waterboards.ca.gov

Mr. James Herink, Staff Counsel Office of Chief Counsel State Water Resources Control Board 1001 I Street, 22nd Floor Sacramento, CA 95814



Subject: SWRCB/OCC Files A-2144(a) and A-2144(b) (Consolidated)

Dear Mr. Herink:

The Association of California Water Agencies (ACWA) strongly urges the State Water Resources Control Board to affirm the permit conditions issued by the Central Valley Regional Water Quality Control Board in December 2010 for the Sacramento Regional County Sanitation District's (SRCSD) wastewater treatment plant.

As we indicated in our comment letter to the Central Valley Regional Water Quality Control Board (CVWQCB) dated October 8, 2010 (attached) we believe it is time for SRCSD as the single largest discharger of wastewater into the Delta to implement advanced treatment technologies to help reduce adverse impacts to the Delta ecosystem. The ecosystem and water quality challenges are complex, but the scientific evidence clearly indicates that the more stringent permit conditions approved by the CVRWQCB are necessary and need to be implemented on the time schedule identified in the permit.

ACWA and its member agencies are keenly invested in working with the State and Federal governments and other public and non-profit organizations statewide in to achieve a comprehensive and sustainable solution to the overall Delta crisis. We believe it is clear that reducing ammonia, nitrate, and pathogens in the Delta is critical to that effort, and we urge the SWRCB to uphold the permit approved by the Central Valley Regional Water Quality Control Board.

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If you have any questions, please contact me or Mark Rentz, Director of Regulatory Affairs. We can be reached by phone at (916) 441-4545.

Thank you for your consideration.

Sincerely,

Timothy H. Quinn Executive Director

cc:

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