



October 7, 2010

Katherine Hart, Chair  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670-6114

Dear Chair Hart and other Members of the Board:

I am writing to express concern over issues associated with the proposed renewal of the NPDES Permit for the Sacramento Regional County Sanitation District's Sacramento Regional Wastewater Treatment Plant. The Sacramento Area Council of Governments, under federal and state law, is responsible for regional scale transportation, land use, housing and air quality planning in the 6 county Sacramento region. We are not responsible for water quality planning; therefore, my comments do not address the science or economics of the water quality issues associated with the Permit renewal. However, there are strong cross-impacts between water quality planning and the topics central to our planning mission. Clearly the public's interest is best served if those cross-impacts are thoroughly understood and considered before you make your decision.

In SACOG's planning work over the last decade we have worked hard to build first-class data and modeling capabilities to support our planning. Many have recognized our work as leading the nation in improving the quality of regional planning. The Blueprint, our long-range growth strategy, relies on focusing future development in the inner areas of our region and developing more compactly through higher percentages of attached for sale and rental products and small lot single family. Our analysis clearly demonstrates multiple benefits from this growth strategy, including substantially reduced water demand, significantly lower impacts from urbanization on watersheds, riparian corridors, wetlands and vernal pools, and reduced air pollution, including greenhouse gases that threaten to increase water flows during flood season.

The possibility of substantially increased development fees and monthly charges stemming from the renewal of the NPDES Permit threatens the implementation of the Blueprint growth strategy that produces the benefits listed above as well as many others to our region's transportation system, economy and overall quality of life. We have not independently evaluated the merits of the range of projected cost impacts provided by the Sacramento Regional County Sanitation District, but it is clear that even the costs at the low-end of their range will make housing and business growth substantially less economically viable in exactly the part of the region we are targeting for the highest growth rates. The cost increases also will have their greatest impact on the less expensive housing products for which we believe there is high and growing market demand.

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Galt  
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Marysville  
Placer County  
Placerville  
Rancho Cordova  
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Winters  
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The effect of substantially reducing the economic viability of growth in Sacramento County and West Sacramento will be to create market pressures for that growth to move elsewhere in the region and beyond. Given our region's specific geography that more spread out growth pattern would mean higher impacts on water resources, longer commutes and more congestion, and more air pollution and greenhouse gases emissions. Many of the impacts are directly counter to other state laws and policies, most notably the California Air Resources Board's recently adopted regional greenhouse gas emission targets under SB375 and the Housing and Community Development Department's regional housing needs requirements.

We certainly respect the need to protect water quality in the state and region. This letter is not intended to directly or indirectly imply otherwise. But I do hope you will agree that the unintended consequences of your draft action are potentially significant and counterproductive to growth patterns that protect water quality as well as other important public policy goals in this state and that you will comprehensively identify and evaluate those impacts before making your decision. My agency would welcome the opportunity to work constructively with the Central Valley Water Quality Control Board to do that evaluation. We have many quantitative analysis tools that I believe would be helpful to you in conducting that analysis.

Sincerely,



Mike McKeever  
Executive Director

cc: Cheryl Maki  
Julian Isham  
Karl Longley  
Sandra Meraz  
Dan Odenwelder  
Robert Walters  
Pamela Creedon