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# Assembly California Legislature



**TED GAINES**  
ASSEMBLYMAN, FOURTH DISTRICT  
ASSISTANT REPUBLICAN LEADER

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October 8, 2010

Ms. Katherine Hart, Chair  
Central Valley Regional Water  
Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670

Subject: Draft NPDES Permit for Sacramento Regional County Sanitation District

Dear Ms. Hart:

On behalf of my constituents, many of whom are served by the Sacramento Regional County Sanitation District (SRCSD), I would like to share my concerns regarding the proposed NPDES permit and Waste Discharge Requirements ("Draft Permit") for SRCSD dated September 3, 2010. It is my understanding that the Central Valley Regional Water Quality Control Board ("Board") will consider this matter soon, and I urge them to reject the proposed staff recommendations which would *triple* sewer rates resulting in an economic hardship on the entire Sacramento region with little demonstrated ecological benefit to the Delta.

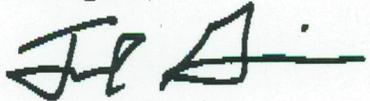
It is my understanding that this proposal would impose new permit limits on SRCSD that would require the construction of micro-filtration treatment facilities at a conservative cost of approximately \$1.2 billion. These upgraded facilities would be required based on excessively restrictive effluent limits that go far beyond the 1999 California Department of Public Health guidelines as well as the historical practice of the Board.

Additionally, I am deeply concerned that the proposed Draft Permit may be imposing restrictive limits solely on the basis of speculation that undiluted treated water may be used for agricultural irrigation. This is without scientific foundation and would move the Board into the realm of applying the "precautionary principle" to its permitting decisions. This must be rejected. Permitting decisions must be based on sound, objective science. The Sacramento Region cannot afford the economic devastation that would be forced on ratepayers to build a billion dollar micro-filtration treatment plant without a solid basis of fact.

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The proposed new permit limits for SRCSD that would require the ratepayers to fund \$2.1 Billion in treatment plant upgrades, and the justifications given for these limits are unfounded, at best. As a state representative for residents and ratepayers served by the SRCSD, I respectfully request that the Regional Board reject the staff's proposed Draft Permit.

Best regards,

A handwritten signature in black ink, appearing to read 'Ted Gaines', with a long horizontal line extending to the right.

**TED GAINES**  
**Assemblyman, Fourth District**