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Assembly California Legislature



ALYSON L. HUBER
ASSEMBLYMEMBER, TENTH DISTRICT

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CRISIS
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AND JOBS TASK FORCE

September 28, 2010

Ms. Pamela Creedon, Executive Officer
Central Valley Regional Water
Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

Dear Ms. Creedon:

I am writing to support the Sacramento Regional County Sanitation District's (SRCSD) request that the Central Valley Regional Water Quality Control Board reject the recommendations contained in the draft National Pollutant Discharge Elimination System (NPDES) permit and Waste Discharge Requirements (Draft Permit), which were made public earlier this month. If adopted, these regulations would result in devastating economic hardship on the Capitol Region and have little ecological benefit to the Delta.

If the SRCSD treatment facility were having a negative human health or environmental impact on the Sacramento River, it would be reasonable to expect the ratepayers to pay for treatment plant upgrades to obviate those impacts. But a review of the SRCSD Draft Permit calls into question the basis for those requirements. The Draft Permit would impose new pathogens standards, requiring SRCSD to upgrade the existing treatment facilities to "micro-filtration" to meet "tertiary treatment" levels. Furthermore, according to the Fact Sheet accompanying the Draft Permit, it is estimated that upgrading the SRCSD treatment facilities will cost more than \$2 billion, effectively tripling rates for residents and businesses. This is a significant burden to place on the region's ratepayers when the benefit of the upgrades has not been adequately demonstrated.

I also know that your Regional Board adopted an NPDES permit for the City of Rio Vista (Order No. R5-2010-0081) several months ago that does not impose the same pathogens standards, despite the fact that both treatment plants discharge to the Sacramento River where dilution ratios are at least 20-to-1. Moreover, it is my understanding that, of 18 NPDES permits issued to municipal wastewater treatment plants by your Regional Board since 2007, all but two follow the approach your Board took in the Rio Vista permit, instead of imposing the more restrictive levels as proposed for SRCSD. Before the Regional Board imposes an expensive treatment plant upgrade on the ratepayers of the Capitol Region, it must adequately explain this disparate regulatory treatment of similarly situated treatment facilities in your region.

Thank you for your attention to this matter. If you have questions, please call my capitol office at 916-319-2010.

Sincerely,

ALYSON L. HUBER
Assemblymember, 10th District