



CUCAMONGA VALLEY WATER DISTRICT

10440 Ashford Street
Rancho Cucamonga, CA 91730-2799
(909) 987-2591 Fax (909) 476-8032

ROBERT A. DeLOACH
Secretary / General Manager/CEO

October 7, 2010

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

RE: National Pollutant Discharge Elimination System (NPDES) Permit- Sacramento Regional County Sanitation District

Dear Ms. Hart:

The upcoming decision by the Central Valley Regional Water Quality Control Board on the NPDES Permit for the Sacramento Regional County Sanitation District facility has a direct impact on the future of the Cucamonga Valley Water District and the 200,000 residents who live within our service area. A key water supply comes across the Sacramento-San Joaquin Delta; a supply that now faces unprecedented restrictions due to endangered species such as the delta smelt. Communities and farms across California lost access to more than 600,000 acre-feet of water supplies this year, which is an equivalent supply to all the water demand of the Sacramento region. The water supplies for 25 million Californians will remain at risk until a comprehensive solution to the Delta crisis is under way. A key element of that solution is an updated NPDES Permit for this wastewater facility.

The Sacramento Regional wastewater facility is the largest contributor of ammonia to the Delta and is the largest that has yet to undergo an upgrade to an advanced form of wastewater treatment, which is commonplace for similar facilities in Southern California. We agree with the Regional Board staff that the growing body of scientific evidence points to ammonia as one of the stressors contributing to the current ecological crisis by altering the food web in ways that advantage non-native species and disadvantage species such as delta smelt, and we concur with the recommendation for ammonia removal treatment. Likewise, we echo the recommendations of the Regional Board staff and the California Department of Public Health to remove pathogens from the Sacramento facility's discharge stream. Pathogen removal is important for recreational uses downstream as well as for downstream drinking water uses. The State Water Contractors have submitted comments that we also support.

Southern California water customers likely face billions of dollars of additional costs in the coming years in the hopes of regaining a reliable water supply from the State Water Project. But it will take a comprehensive approach, including the reduction in ammonia as part of a nutrient management strategy, to achieve California's co-equal goals of ecosystem restoration and water supply reliability in the Delta. The adoption of this key NPDES permit is a critical step in making this goal a reality.

RANDALL J. REED
President

KATHY TIEGS
Vice President

OSCAR GONZALEZ
Director

HENRY L. "HANK" STOY
Director

JAMES V. CURATALO, JR.
Director

Sincerely,



Jo Lynne Russo-Pereyra
Assistant General Manager for External Affairs

cc: Ms. Kathleen Harder, Central Valley Regional Water Quality Board
Ms. Dee Zinke, Metropolitan Water District of Southern California