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MEMBER AGENCY OF THE
METROPOLITAN WATER
DISTRICT
OF SOUTHERN CALIFORNIA

October 4, 2010

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

RE: NPDES Permit for Sacramento Regional County Sanitation District

Dear Chair Hart and Board Members:

Las Virgenes Municipal Water District (LVMWD) provides potable water service, wastewater treatment and recycled water service to customers in western Los Angeles County. We are entirely dependent upon the State Water Project for potable water but we offset that dependence by processing and distributing over 6,000 acre-feet of recycled water. Last year, 20 percent of all the water delivered by LVMWD to customers was Title-22 compliant, tertiary-treated recycled water processed at the Tapia Water Reclamation Facility (Tapia) operated by our agency. A noteworthy fact regarding the NPDES permit for Tapia is that it may not discharge its highly treated effluent to Malibu Creek for seven months each year (April 15 to November 15). As a direct result of the stringent conditions in Tapia's NPDES permit, a single family residential customer pays \$108 bimonthly (\$54/month) for wastewater treatment (sewer) service from LVMWD.

The pending NPDES Permit for the Sacramento Regional County Sanitation District (SRCSD) facility has direct implications for LVMWD and its customers. The supply of water flowing through the Sacramento-San Joaquin Delta has been restricted by court order due to endangered species such as the delta smelt. As a result of those reduced flows, last year, LVMWD customers were required to significantly reduce their potable water use by over 20 percent. Their water supply and that of 25 million other Californians will continue to be a significant issue until a comprehensive solution to the Delta is implemented. A key element of that solution is an updated NPDES Permit for the SRCSD wastewater facility.

The SRCSD facility is a significant contributor of ammonia to the Delta and has yet to undergo an upgrade to an advanced form of wastewater treatment. The objectives of the federal Clean Water Act are clear and the impacts of ammonia on aquatic life are well established. In our view, there should be no further delay in adopting regulations to address this concern.



LVMWD also agrees with recommendations by Regional Board staff and the California Department of Public Health to remove pathogens from the SRCSD facility's discharge stream. Pathogen removal is important for recreational uses and for downstream drinking water consumers.

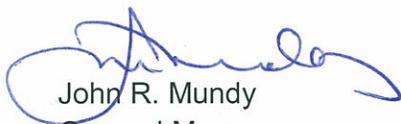
As identified in the NPDES Permitting Options document, there appears to be several viable options for the SRCSD facility to explore, including the use of its treated effluent for agricultural use in the region, which would also offset the use of existing but limited water resources for that purpose. LVMWD supports any viable option that is protective of the beneficial uses of the Delta. LVMWD also supports compliance schedules that provide adequate time for the agency to comply in a prudent manner and make the best use of limited resources.

While costs must be considered, the current \$39.70 currently paid bimonthly by SRCSD customers (single family residential service) is substantially below that paid in many other areas of the state – and significantly less than the \$108 (bimonthly) currently paid by LVMWD customers. Given the large number of SRCSD customers and the ability to finance major infrastructure investments over 30 years (or more) it is logical to conclude that the needed improvements are necessary and affordable at rates that are still reasonable. While SRCSD customers may understandably not be pleased with a rate increase, as the operator of a wastewater treatment facility, LVMWD fully understands that compliance with the Clean Water Act can be costly; however, our Board and our customers have come to recognize these expenses as necessary when science supports the adoption of beneficial advanced treatment methods to protect beneficial uses.

We would urge Sacramento regulators, wastewater treatment operators and customers to not regard this as a "north vs. south" issue; it is truly a California issue impacting the Delta, its complex ecosystems and all state residents downstream.

Las Virgenes and other Southern California water customers likely face billions of dollars of additional costs in coming years with the hope of regaining a reliable water supply through 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 NPDES permit is a critical step in making this goal a reality.

Sincerely,



John R. Mundy
General Manager

Copies: Roberta Larson, CASA
Metropolitan Water District