



Municipal Services Agency

Department of County Engineering
Steven M. Pedretti, Director

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Interim County Executive

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County of Sacramento

October 8, 2010

Regional Water Quality Control Board
Central Valley Region – Sacramento Office
11020 Sun Center Drive, Su. #200
Rancho Cordova, CA 95670

RE: SRCSD Tentative Discharge Permit Comments – Sent by Fax: (916) 464-4645

Dear Board Members;

Thank you for the opportunity to respond to the Sacramento Regional County Sanitation District's (SRCSD) Tentative Discharge Permit. While water is a precious resource and it is your role to protect water quality by regulating potentially water polluting practices, the manner in which the Board enforces these regulations needs to be balanced with the economic realities certain solutions bring. As the Infill Development Coordinator for Sacramento County I am charged with facilitating and incentivizing sustainable infill development. As I'm sure you are well aware the federal and state governments recognize that one of the key solutions to addressing climate change, green house gas reductions and development of sustainable communities is to focus new growth within our urban and suburban areas, rather than promoting sprawl and greenfield development. In doing this we rely on our existing infrastructure within our existing communities. There are many challenges to doing infill development and as a county we are doing all we can to reduce development costs in order to incentivize new development.

Especially in this economic downturn it has become exceedingly difficult to get projects to pencil out to make financial sense for businesses. Loans and financing are difficult if not impossible to obtain. Lease and rental rates for commercial and retail are very low and property owners are challenged to get rents to cover building and operational costs. The county has been trying to assist development by providing sewer and water connections to vacant and underserved properties that hold development promise, as one of the ways to entice developers to locate their businesses in our communities and especially in our redevelopment areas. If SRCSD is required to implement the draft permit requiring advanced treatment these costs will bring the work we have been doing to a complete halt. The County does not have the funds to capture or assist with what the projected potential costs would be for sewer connections and impact fees. Further, residents and businesses already straining to just get by will no longer be able to afford their monthly utility bills.

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As a compromise I request your Board consider a phasing plan, over a period of 25-30 years. Granted any rate increases in our current economy will make things even harder, but I understand that some improvements need to be initiated. I ask you consider a reasonable more manageable and incremental approach to implementation of the new permit. Perhaps there will be opportunities for SRCSD and the Region to obtain other federal or state funding to assist with permit implementation to minimize the impacts to our hundreds of thousands of residents.

The Sacramento Region has taken great strides with the SACOG Blueprint, Clean Tech, LEED, Greenwise and numerous other initiatives to promote sustainable development in this region which brings with it jobs and an enhanced economic base. We are advancing these initiatives with various new development projects that bring jobs and new housing to the region. Sacramento is well positioned in being a leader in the state and the country in advancing green energy and sustainable initiatives. Please work with SRCSD and this region in developing sustainable and affordable solutions that won't leave our residents, businesses and all our work "dead in their tracks."

Thank you again for the opportunity to comment and for consideration of the requests within this comment letter.

Sincerely,


Judy Robinson
Infill Development Coordinator