

# Victor Valley Wastewater Reclamation Authority

*A Joint Powers Authority and Public Agency of the State of California*

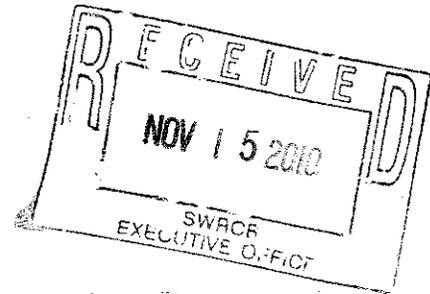
15776 Main Street, Suite 3 • Hesperia, California 92345

Telephone: (760) 948-9849 • Fax: (760) 948-9897

e-mail: mail@vwwra.com

November 4, 2010

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, Sacramento, CA 9581



Dear Board Members,

I have reviewed the draft policy for toxicity assessment and control, and while I applaud the efforts to further protect public health, I believe there are provisions in the policy that would have severe negative impacts on publicly owned treatment works (POTW) such as those run by the Victor Valley Wastewater Reclamation Authority.

First and foremost, in several areas, the proposed policy is more stringent than federal law. Examples of this include the policy's requirement for maximum daily effluent limitations and the automatic assumption of reasonable potential for toxicity for large POTWs. These requirements that are more demanding than federal law become unfunded state mandates. Agencies like VVWRA are already working creatively and efficiently to meet unfunded state mandates with as little fiscal impact to rate payers as possible. Having to pass through costs for new mandates in a time when Californians are struggling to whether the economic downturn would be ill-advised.

Additional costs are also expected to be incurred due to provisions in the draft policy such as the required chronic toxicity testing of essentially all dischargers as well as potential costly Clean Water Act violations due to exceedances of numeric acute toxicity limits.

The list of unnecessary negative impacts goes on, and due to the fact that there is no evidence that these objectives and effluent limits are needed, I cannot support the draft policy in its current form.

Respectfully,

A handwritten signature in black ink, appearing to read "Logan Olds".

Logan Olds  
General Manager, Victor Valley Wastewater Reclamation Authority