CITY OF RANCHO CORDOVA
CALIFORNIA
Incorporated 2003

RECEIVED
SACRAMENTO
CVRWQCB
10 OCT 11 AM 9:08

KCH

Ken Cooley
Mayor

Robert McGarvey
Vice Mayor

Linda Budge
Council Member

David Sander
Council Member

Dan Skoglund
Council Member

October 5, 2010

Regional Water Quality Control Board, Central Valley Region
11020 Sun Center Dr., Suite 200
Rancho Cordova, CA 95670

Attn: Kathleen Cole Harder

RE: SRCSD Tentative NPDES Permit

Dear Ms. Cole Harder:

On behalf of the City of Rancho Cordova, we are writing to support the Sacramento Regional County Sanitation District's (SRSCD) 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, which were made public early September.

If SRCSD is required to increase the level of wastewater treatment as outlined in the draft permit, City residents and businesses could see their sewer rates more than triple. Sewer Impact fees for construction of new homes and businesses would also have to be increased dramatically. This is a significant burden to place on the city's ratepayers when the benefit of the upgrades has not been adequately demonstrated.

The draft permit requires advanced treatment based in large part on the science that is not fully vetted or compelling enough to make informed regulatory decisions. Therefore, the cost to the community is not appropriately balanced against the uncertain improvements to the environment and public health. This permit goes beyond what is "reasonable and necessary" as required by the Clean Water Act, and enters into policy-setting based on perception and not based on a documented public health problem or existing standards. For example, the permit threshold requirements for Cryptosporidium and Giardia exceed the standards established by the United States Environmental Protection Agency (USEPA). USEPA standards are used for protection of California's public beaches, so why are they not appropriate for the Sacramento River? We also understand that, of 18 NPDES permits issued to municipal wastewater treatment plants by your Regional Board since 2007, all but two impose less restrictive pathogens standards than the ones recommended for SRCSD.

2729 Prospect Park Drive Rancho Cordova, CA 95670 (916) 851-8700 Fax (916) 851-8787 www.cityofranchocordova.org

SRCSD has studied and acknowledged the scientifically established need to remove about half of the ammonia from its effluent based on the potential for future low dissolved oxygen condition in the river under rare circumstances. Before our region is forced to construct massive facility improvements, we believe it would be prudent to perform additional studies, pilot testing and obtain better consensus around the science.

Thank you for your attention to this matter.

Sincerely,

Ken Cooley
Mayor

Robert McGarvey
Vice Mayor

Linda Budge
Council Member

David Sander
Council Member

Dan Skoglund
Council Member