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September 30, 2010

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

Subject: Draft NPDES Permit for Sacramento Regional County Sanitation District

Dear Ms. Hart:

Over the past few weeks, I have become aware of the Regional Board's proposed NPDES permit and Waste Discharge Requirements ("Draft Permit") for the Sacramento Regional County Sanitation District (SRCSD). SRCSD provides important water quality services to my constituents and as a result, I am providing my comments on this Draft Permit. Although water in California has always been one of the thorniest and most complicated policy issues to develop consensus, we are all working to toward ensuring a sustainable Delta. However, I am very concerned with the significant demands contained in the draft permit that impose scientifically unjustified mandates on the ratepayers of the Sacramento region.

It is imperative that the integrity of the regulatory process governing *all* wastewater dischargers in California be consistent, fair, reasonable, protective of water quality, and - - above all else - - be based on sound, objective science. It is critical that the Regional Board's permitting process be immune from the politics surrounding the rest of the Delta debate.

The citizens of the Delta Region and specifically the ratepayers of SRCSD support clean water and a healthy environment. But we also know that a healthy environment can only be made possible if there is a healthy and strong economy to support it.

I understand that the Regional Board staff is proposing certain permit limits related to ammonia and pathogen discharges. These limits would require SRCSD ratepayers to spend nearly **\$2.1 Billion** for treatment plant upgrades at an annual operations and maintenance increased cost of **\$77 Million** each year. The direct impact of these cost estimates means that every family can expect their monthly regional sewer treatment bills from SRCSD to **increase from about \$20 per month into the range of \$60 per month. Local sewer collection service currently adds about an additional \$20 more to the total sewer bill for residents.** New sewer "hook-up" fees will balloon from around \$7,500 for a new home, to as much as \$30,000 or more. These "hook-up fees" will also escalate for the Region's industries and businesses. For example, a typical new "dine-in" restaurant would see their

Page Two
Ms. Katherine Hart, Chair
September 30, 2010

connection fees increase from \$14,900 to \$70,000 per 1,000 square feet. As a result, these fees will have a devastating impact on low-income and fixed-income senior citizens served by SRCSD and will significantly impair the Delta Region's economic recovery and long-term stability.

I appreciate that there are complex scientific issues involved in SRCSD's permit. However, from what I've been reading about ammonia and its impact on the Delta ecosystem, it seems clear to me that the scientists *themselves* have not developed a consensus on what effects the SRCSD ammonia discharge is having on the Delta ecosystem. It is my understanding that both the State Water Resources Control Board's recently adopted flow criteria and the California Department of Fish and Game draft biological objectives and flow criteria report indicate that ammonia does not appear to be acutely or chronically toxic to delta smelt and other species and more research is needed on the effects of nutrients on Delta ecosystem and its food web. As such, it is fair to question the appropriateness of imposing extremely stringent permit limits that will irrevocably commit SRCSD and its ratepayers to a course of action that may have little or no benefit to the environmental health of the Delta and where the science is inconclusive on potential food web impacts.

Sincerely,



Daniel E. Lungren
Member of Congress