



10545 Armstrong Avenue

Mather, CA 95655

Tele: [916] 876-6000

Fax: [916] 876-6160

Website: www.srcsd.com

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July 22, 2009

Mr. Kenneth Landau
Assistant Executive Officer
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, California 95670

Electronic Mail: byee@waterboards.ca.gov

SUBJECT: Triennial Review for the Sacramento River and San Joaquin River Basins

Dear Mr. Landau:

The Sacramento Regional County Sanitation District (SRCSD) appreciates the opportunity to provide comments as part of the Triennial Review of the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins (Basin Plan). The Clean Water Act's triennial review process is critical to ensure maintenance and amendment of the Basin Plan as necessary to achieve the highest water quality that is reasonably attainable. Given the importance of the basin planning process to achieve water quality objectives, wastewater agencies, industry, agriculture, the State and Regional Water Boards and other stakeholders must all work together to find creative solutions for updating these Basin Plans. To demonstrate our commitment to stakeholder processes, SRCSD is involved with the Mercury TMDL Stakeholder Workgroup and a partner in the Central Valley Drinking Water Policy Workgroup. We also are working with the Sacramento River Watershed Program to develop a regional monitoring program for the Sacramento River that will provide meaningful data for future basin plans amendments.

SRCSD supports the comments submitted by the Central Valley Clean Water Association on the following priority issues and urges the Regional Water Board to address these priority issues before the next triennial review:

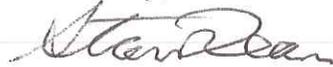
- Salt Management Policy
- Drinking Water Policy
- Ammonia & Chlorine Objectives
- Pesticide Control Program
- Remove Incorporation by Reference of Secondary Maximum Contaminant Levels
- Remove Non-Detect Standard for Organochlorine Pesticides
- Three Species Chronic Test

In addition, SRCSD urges the Regional Water Board to address the priority issue of adopting bacteria objectives that are based on appropriate indicators such as fecal coliform, enterococcus or e.coli. Existing total coliform effluent limits in NPDES permits are not based on water quality objectives contained in the Basin Plan. Also, total coliform bacteria concentrations are not the best available indicators to determine the presence of pathogens in receiving waters. To that extent, SRCSD encourages the Regional Board to move forward with the adoption of appropriate bacteria indicators. Also, the Regional Board must adopt a plan for the implementation of the bacteria objectives that properly guides staff on the linkage between adopted water quality objectives and water quality based effluent limitations. Currently, wastewater agencies are receiving effluent limitations that are not based on adopted water quality objectives. An implementation policy should be adopted by the Regional Board that correctly ties the two functions together.

SRCSD encourages the Regional Water Board to carefully prioritize the issues and look for creative ways to work with concerned stakeholders to ensure that these issues actually are addressed before the next triennial review.

Thank you for your consideration. Please contact me at (916) 875-9101 if you have any questions.

Sincerely,



Stan R. Dean
Director of Policy and Planning