



**Sacramento Regional Wastewater
Treatment Plant**

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Board of Directors

Representing:

- County of Sacramento
- County of Yolo
- City of Citrus Heights
- City of Elk Grove
- City of Folsom
- City of Rancho Cordova
- City of Sacramento
- City of West Sacramento

Stan R. Dean
District Engineer

Ruben R. Robles
Director of Operations

Prabhakar Somavarapu
Director of Policy & Planning

January 28, 2011

Via E-Mail: deltaplancomment@deltacouncil.ca.gov

Delta Stewardship Council
Council Members
980 Ninth Street, Suite 1500
Sacramento, California 95814
deltaplancomment@deltacouncil.ca.gov

**Subject: Notice of Preparation on Draft Environmental Impact Report
for the Delta Plan, December 10, 2010**

Dear Council Members:

The Sacramento Regional County Sanitation SRCSD (SRCSD) appreciates the opportunity to comment on the Delta Stewardship Council's (Council) Notice of Preparation (NOP) for the Draft Environmental Impact Report (EIR) being prepared to support adoption of the Delta Plan. SRCSD has been and will continue to be an active participant in the development of a Delta Plan.

While SRCSD appreciates the Council's outreach efforts through the Scoping Meetings held for this NOP, the lack of information about the Delta Plan makes it difficult to offer constructive comments on the scope of environmental review or alternatives. However, there are some areas of the legally required elements of the Delta Plan that are beginning to take shape in an outline format in the NOP, and SRCSD is providing specific comments on that outline regarding recycled water, water quality, regional monitoring, and Utilities.

Our specific comments on the NOP are outlined below:

Page 18, Lines 22-23: Stating the recommendations in the Bay Area Regional Water Recycling Program and the Southern California Water Recycling Projects Initiative would be helpful. Knowing what these recommendations are would allow SRCSD to evaluate whether the recommendations support water recycling. A primary issue for recycled water is funding the necessary infrastructure for producing and distributing recycled water. If these recommendations are specific to funding mechanisms for recycled water, it would be helpful for the Council to spell those mechanisms out and support pursuing those funding mechanisms in general. However, if the recommendations are to support specific local

recycled water projects, SRCSD requests the inclusion of a potential recycled water project in South Sacramento County be included in the Delta Plan. This recycled water project was detailed in our May 12, 2010 comment letter to the Council on the Interim Delta Plan (attached).

Page 21, Line 17: The Regional Water Quality Control Board's implement the National Pollution Discharge Elimination System permit program, under delegated authority from the United States Environmental Protection Agency, derived from the Clean Water Act. How the council would implement or accelerate this program is unclear. The relationship of the Delta Plan to the Regional Water Board's regulatory authority over activities within the Delta must be clearly identified in the Delta Plan.

Page 23, Lines 24-27: The NOP states that a rigorous data collection system should be available for all agencies to use. The Delta Plan should clearly state whether this rigorous data collection system is meant to be a regional monitoring program used to establish performance measures and make adaptive management decisions. Data collected from a regional monitoring program and subsequent analysis, will support adaptive management decisions regarding the Delta Plan, into the future. The Independent Science Board in their January 26, 2011 report regarding multiple stressors also pointed out the importance of monitoring programs and timely analysis of the data. The need for an integrated regional monitoring program will become apparent as the Council tries to determine relevant performance measures against which adaptive management decisions will be made.

A Delta regional monitoring program needs a funding source to be successful, and identifying funding sources in the Delta Plan and EIR would be helpful. A discussion of funding a Delta regional monitoring program can be found in the Central Valley Regional Water Board's May 2010 Draft Delta Regional Monitoring Outline, located at:
http://www.swrcb.ca.gov/rwqcb5/water_issues/delta_water_quality/comprehensive_monitoring_program/draft_prog_plan_may2010.pdf

The Water Board's draft outline is limited to water quality and the Council should evaluate the importance of having a regional monitoring program that is more inclusive than just water quality parameters, such as including ecological and hydrologic parameters to perform a more holistic analysis of the state of the estuary. The Central Valley Regional Water Board could greatly use the Council's support in uniting the multiple parties and programs that will be required to work together for an integrated monitoring program which incorporates hydrologic, ecologic, and water quality data into performance measures.

Page 29, Line 28: The utilities section needs to have sewage conveyance and wastewater treatment added to the list of utilities that the EIR will evaluate potential environmental effects.

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Sacramento Area Sewer District owns and operates a sewage collection system for the towns of Cortland and Walnut Grove, with the wastewater from these towns treated at SRCSD's regional wastewater treatment plant. In addition, projects yet to be identified in the Delta Plan could impact SRCSD's operations and alternatives should be evaluated in the EIR.

SRCSD thanks you for the opportunity to provide these comments and looks forward to our continued involvement in development of a Delta Plan that will lead to the recovery of the Delta ecosystem. If you have any questions regarding our comments, please contact me at 916-876-6092 (mitchellt@sacsewer.com) or Linda Dorn at 876-6030 (dornl@sacsewer.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Terrie Mitchell", written in a cursive style.

Terrie Mitchell,
Legislative and Regulatory Affairs Manager

LD:oro

Cc: Stan Dean, District Engineer (SRCSD)
Prabhakar Somavarapu, Director of Policy and Planning (SRCSD)
Linda Dorn, Environmental Program Manager (SRCSD)

Attachment: Sacramento Regional County Sanitation District Comments to Interim Delta Plan,
May 12, 2010



Main Office

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May 12, 2010

Mr. Pat Rogers
Delta Stewardship Council
650 Capitol Mall, 5th Floor
Sacramento, CA 95814

Sacramento Regional Wastewater

Treatment Plant

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Via email to interimplan@deltacouncil.ca.gov

**SUBJECT: Sacramento Regional County Sanitation District
Comments to Interim Delta Plan**

**Board of Directors
Representing:**

- County of Sacramento
- County of Yolo
- City of Citrus Heights
- City of Elk Grove
- City of Folsom
- City of Rancho Cordova
- City of Sacramento
- City of West Sacramento

Dear Mr. Rogers:

The Sacramento Regional County Sanitation District (SRCSD) provides regional wastewater collection and treatment service to 1.3 million residents in the greater Sacramento area. SRCSD supports efforts to finding practical and effective solutions to the issues facing the Delta ecosystem and the sustainability of the State's water supply.

The California Water Plan Update 2009 states that, "Water conservation, recycling, and greater system efficiency in California must continue to be a fundamental strategy for all regions and individual water users in California."

SRCSD recognizes water recycling as a critical component in accomplishing the coequal goals of providing a more reliable water supply for California while protecting, restoring, and enhancing the Delta ecosystem. Water recycling is a high priority related to several of the critical Delta issues that should be fully encouraged, but not mandated, in the Delta Plan. Recycled water can provide a safe and reliable water supply for agricultural lands, offset groundwater pumping, and increase potable water supplies while supporting habitat restoration and mitigation activities. However, in order to make water recycling a viable and feasible option, state and federal funding will be needed to help offset project costs and to guide the future direction for water recycling in the Sacramento area.

SRCSD recommends that the Interim Delta Plan focus on promoting water recycling projects and helping to secure the associated funding that will be necessary to ensure water recycling becomes a reality. SRCSD recommends two projects for inclusion in the Interim Delta Plan to help achieve the two equal goals:

- South Sacramento County Agriculture and Habitat Water Recycling Project and
- Cosumnes River Flow Restoration Project

Mary K. Snyder
District Engineer

Stan R. Dean
Director of Policy and Planning

Prabhakar Somavarapu
Director of Operations

Marcia Maurer
Chief Financial Officer

Claudia Goss
Director of Communications

Mr. Pat Rogers
May 12 2010
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Proposed Project #1: South Sacramento County Agriculture and Habitat Water Recycling Project

SRCSO has completed preliminary planning for a recycled water project in south Sacramento County. The project would use disinfected, recycled water from the SRCSO wastewater treatment plant in lieu of pumped groundwater to irrigate permanent, non-human consumption agriculture and habitat mitigation lands through a series of new water transmission pipelines. The initial feasibility study indicates that the project could save as much as 10,440 to 42,000 acre-feet of groundwater annually.

The South Sacramento County Agriculture and Habitat Water Recycling Project provides the following benefits:

- Protects water supplies by using recycled water in lieu of groundwater;
- Reduces over-drafting of the local groundwater table;
- Provides a drought-resistant water source that is not dependent on seasonal flows;
- Supports habitat restoration activities and agriculture.

Proposed Project #2: Cosumnes River Flow Restoration Project

The Cosumnes River flows through the Sacramento Central Valley, providing environmental habitat for hundreds of birds, plants, fish and wildlife species along its course from the Sierra Nevada Mountains to the Mokelumne River, and eventually into the Sacramento - San Joaquin Delta. The river is also a source of recharge to the local groundwater system. Unfortunately, flows in the Cosumnes River have declined due to several factors including drought and depletion of the local groundwater table.

The Cosumnes River Flow Restoration Project would provide a reclaimed water supply to augment existing natural flows in the Cosumnes River. The reclaimed water would be transmitted via pipeline to a discharge point at the Cosumnes River and would provide flows for channel wetting and to supplement the river's natural flow. Restoration of the Cosumnes River and a reclaimed water flow augmentation project may ultimately benefit salmon migration and passage in the river through restoration of the historical flow pattern, particularly during times of drought.

Thank you for the opportunity to provide comments on the Interim Delta Plan. Our responses, which are attached, include details for each of our proposed projects and answers to the eight questions contained in the invitation for comments. If you have any questions or comments, please contact me at 916-875-9101.

Sincerely,



Stan R. Dean
Director of Policy and Planning

cc: Mary Snyder, District Engineer
Terrie Mitchell, Legislative and Regulatory Affairs Manager

Attachments: SRCSO Proposed Project #1
SRCSO Proposed Project #2

**SRCS D Proposed Project #1:
South Sacramento County Agriculture and Habitat Water Recycling Project**

SRCS D has completed preliminary planning for a recycled water project in south Sacramento County. The project would use disinfected, recycled water from the SRCS D wastewater treatment plant in lieu of pumped groundwater to irrigate permanent, non-human consumption agriculture and habitat mitigation lands through a series of new water transmission pipelines. The initial feasibility study indicates that the project could save as much as 10,440 to 42,000 acre-feet of groundwater annually.

The South Sacramento County Agriculture and Habitat Water Recycling Project provides the following benefits:

- Protects water supplies by using recycled water in lieu of groundwater;
- Reduces over-drafting of the local groundwater table;
- Provides a drought-resistant water source that is not dependent on seasonal flows;
- Supports habitat restoration activities and agriculture.

The South Sacramento County Agriculture and Habitat Water Recycling Project is consistent with the following components of the Draft Interim Delta Plan Outline:

- Supports agriculture (Section II.b);
- Supports the ecosystem and habitat restoration in the region (Section III and CA Water Code Section 85066 as referenced);
- Promotes statewide water conservation, efficiency, and sustainable water use (Section IV);
- Development of a drought contingency plan (Section IV.d).

The project is also consistent with:

- California Water Code Section 85084: Supporting early actions, projects, and programs
- California Water Plan Update 2009 Objective #2: Use and Reuse Water More Efficiently.

Our responses to the questions posed by the Delta Stewardship Council are outlined below.

1) Who (which agencies and/or entities are involved - and how are they involved)?

SRCS D has taken a lead role in forming a stakeholder group. Those expressing interest to date include the Cities of Elk Grove and Folsom, Sacramento County Regional Parks and Planning Department, The Nature Conservancy and other conservancy organizations, Sacramento Farm Bureau and other local agencies. The stakeholder group will investigate all viable project options and funding options to initiate a water recycling program in south Sacramento County, while seeking support from local government, developers and businesses. SRCS D would likely take a lead role in the design and construction of this regional water recycling effort. However, cooperation and participation is required from our project partners, local government, the state, and regulatory agencies that can compel and support regional water recycling plan and implementation. State and federal funding will also be needed to offset project costs and ensure the success and viability of the project.

2) What? (Describe project or recommendation)

The South Sacramento County Agriculture and Habitat Water Recycling Project would use recycled water in lieu of pumped groundwater to irrigate permanent agriculture lands that produce crops for non-human consumption (e.g. alfalfa) and habitat mitigation lands through a series of new water transmission pipelines. SRCSD would produce and deliver disinfected secondary-23 recycled water (CDPH Code of Regulations, Title 22) from the SRCSD wastewater treatment plant. The initial feasibility study indicates that 2,000 to 8,000 acres of dedicated land could be irrigated with recycled water. This first phase of the project would irrigate 2,000 acres resulting in a savings of 10,440 acre-feet of groundwater annually. The second phase could irrigate 8,000 acres resulting in a savings of 42,000 acre-feet of groundwater annually. This amount of water saved is the equivalent amount of potable water needed to serve 18,500 to 74,000 homes annually in the Sacramento region.

3) When? (Describe the timeframe to begin and how long to implement)

The planning level feasibility study and water recycling opportunities study for the project were completed by SRCSD in 2007. Provided state and federal funding could be secured to help offset the project costs, the anticipated schedule for the remaining activities is as follows:

Detailed feasibility study:	6 months
Design and completion of EIR	2 years
Construction / Implementation	2 years

4) Priority (Prioritize among your projects and recommendations)

The South Sacramento County Agriculture and Habitat Water Recycling Project is a priority 1 project since it could immediately provide benefits in the form of water conservation, support of environmental habitat, and a reduction in over-drafting of the local groundwater table. Support of this project and a regional water recycling program is an early action that is a key component in the solution to the issues facing the Delta ecosystem and the sustainability of the State's water supply.

5) Who pays? (How will the recommendation or project be paid for ?)

Currently, funding for water recycling projects and programs is very limited and has not historically been adequate to pay for significant local or regional water recycling projects. SRCSD, as a supporter of regional and local water recycling, has funded the initial feasibility studies.

Since water recycling projects are supportive of state and local water conservation strategies and provide immediate and long term benefits for the Delta ecosystem, funding from state and federal agencies is warranted. A state funding system should be developed consistent with the State Water Plan which says "State government has a lead role in coordinating the water management activities of federal, Tribal, regional, and local governments and agencies and developing stable methods for financing water management actions." This is also consistent with the Interim Delta Plan Section VIII.d. "Develop a Delta Plan including finance plan."

SRCSO Proposed Project #1

South Sacramento County Agriculture and Habitat Water Recycling Project

SRCSO recommends increasing the funding for water recycling through Propositions 13, 50, and 84. Additionally, the State should request significant increases in federal appropriations earmarked for local and regional water recycling projects.

A successful outcome of any recycled water project is dependent on both supply and demand. The State should provide financial incentives to local government and regulatory agencies to promote and encourage the use of recycled water by developers, industry and businesses in the area.

6) How will the performance be measured? (What does success look like?)

Short term success would be measured based on timely completion of the project and full capacity annual production and use of 10,440 to 42,000 acre-feet of recycled water. Production and use of the recycled water would also make an equal and quantifiable amount of local groundwater available. Development and increase of land use for habitat and mitigation purposes could also be measured as indicators of successful project implementation.

Future, long term success would occur through the development of a regional recycled water program with incremental stages of infrastructure development and increased flow demand. Key indicators of the regional program's success could be established based on several measurable elements including the volume and flow of recycled water available and utilized in the region, an increase in crops, habitat and mitigation land that is irrigated by recycled water sources, and incremental decreases in groundwater depletion. If substantial recycled water use is established, an increase in flows in the Cosumnes River could result.

7) Consequences (What happens if the project or recommendation is not implemented, or fails to produce expected outcome?)

If the project is not implemented, there would not be a supply of recycled water for the area and no resulting reduction in groundwater use / overuse. There would be no hydrologic or environmental benefits that would otherwise be gained and attributable to the recycled water project. Water reclamation and recycling programs in the area would remain unchanged.

8) Relationship to other projects in the Delta?

The SRCSO South Sacramento County Agriculture and Habitat Water Recycling Project provide a direct contribution to California's Water Plan by providing a sustainable, drought resistant water supply. The project supports the Interim Delta Plan through water conservation and reuse. Other projects and programs that have a direct link to the project include:

- Local and regional water recycling efforts;
- Habitat restoration efforts;
- State water supplies through providing a reliable, sustainable new water source and by reducing demand on groundwater supply;
- This project could provide flows to SRCSO's proposed project #2, The Cosumnes River Flow Restoration Project.

**SRCS D Proposed Project #2:
Cosumnes River Flow Restoration Project**

The Cosumnes River is recognized as one of California's most significant free flowing rivers. The river travels through the Sacramento Central Valley, providing environmental habitat for hundreds of birds, plants, fish and wildlife species along its course from the Sierra Nevada Mountains to the Mokelumne River, and eventually into the Sacramento - San Joaquin Delta. The river is also a source of recharge to the local groundwater system. Unfortunately, flows in the Cosumnes River have declined due to several factors including drought and depletion of the local groundwater table.

The Cosumnes River Flow Restoration Project would provide a reclaimed water supply to augment existing natural flows in the Cosumnes River. The reclaimed water would be transmitted via pipeline to a discharge point at the Cosumnes River and would provide flows for channel wetting and to supplement the river's natural flow. Restoration of the Cosumnes River flow and a reclaimed water flow augmentation project may ultimately benefit salmon migration and passage in the river through restoration of the historical flow pattern, particularly during times of drought.

Preservation and restoration of flow to the river is supported by several of the local nature conservancy groups.

Our responses to the questions posed by the Delta Stewardship Council are outlined below.

1) Who? (Which agencies and/or entities are involved and how are they involved?)

SRCS D could participate as a partner in or act as a lead agency for the project. However, significant participation and project support would be required from resource agencies, the Army Corps of Engineers, the Central Valley Regional Water Quality Control Board, and the State Water Resources Control Board. Funding required for this effort would also be anticipated from state, local and federal sources.

2) What? (Describe project or recommendation)

The Cosumnes River Flow Restoration Project would provide a high quality reclaimed water supply to augment existing natural flows in the Cosumnes River. Reclaimed water would be transmitted via pipeline to a discharge point at the Cosumnes River. This reclaimed water would provide flows for channel wetting and to supplement the river's natural flow.

3) When? (Describe the timeframe to begin and how long to implement)

Provided other private, state and federal funding could be secured to help offset the project costs, the anticipated schedule for activities is as follows:

Planning and initial feasibility study	1 year
Detailed feasibility study:	1 year
Design and completion of EIR	2-3 years
Construction / Implementation	2 years

4) Priority (Prioritize among your projects and recommendations)

The Cosumnes River Flow Restoration Project is considered SRCSD's priority #2 project, but is still a very high priority since it could immediately provide benefits in the form of water conservation, support of environmental habitat, and an increase in the flows to the Cosumnes River during critical low flow periods.

5) Who pays? (How will the recommendation or project be paid for?)

Currently, no funding has been identified for this project. Funding could be provided via existing state or federal funding programs including Propositions 13, 50, and 84 and/or federal appropriations earmarked for local and regional environmental, habitat or ecological restoration projects and water recycling projects.

6) How will the performance be measured? (What does success look like?)

The project success could be measured directly based on the immediate increase in flows to the Cosumnes River. A measure of the flow or volume of reclaimed water supply could be used as a short term performance indicator for the project.

Long term project success could be measured via direct or indirect indicators that the increased flow has resulted in betterment of the local ecological and environmental habitat. An increase in salmon migration through the Cosumnes River channel might be a future measurable, beneficial result of the project.

7) Consequences (What happens if the project or recommendation is not implemented, or fails to produce expected outcome?)

If the project is not implemented, there would not be an augmented flow supply to the Cosumnes River. The flows to the river would remain unchanged and there would be no hydrologic or environmental benefits from the project.

8) Relationship to other projects in the Delta?

The Cosumnes River Flow Restoration Project water supply could come directly from either the South Sacramento County Agriculture and Habitat Water Recycling Project or from a separate project that provides reclaimed water from SRCSD.

The project supports the Interim Delta Plan through water conservation and reuse and support of the health and recovery of the Delta ecosystem.

Other projects and programs that have a direct link to the project include:

- Local and regional water recycling efforts;
- Habitat restoration efforts;
- State water supplies through providing a reliable, sustainable new water source to augment river flows;
- The project addresses concerns expressed in the Cosumnes River Task Force Plan.