



California Sportfishing Protection Alliance
“An Advocate for Fisheries, Habitat, and Water Quality”
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VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

December 29, 2010

Marty Hanneman, Director
City of Sacramento, Department of Utilities
1395 35th Avenue
Sacramento, CA 95822

Gus Vina, Interim City Manager
City of Sacramento
915 I Street, 5th Floor
Sacramento, CA 95814

**Re: Notice of Violations and Intent to File Suit Under the
Federal Water Pollution Control Act**

To the above-listed notice recipients:

California Sportfishing Protection Alliance (“CSPA”) hereby provides notice of CSPA’s intent to sue for violations of the Federal Water Pollution Control Act, 33 U.S.C. §§ 1251 *et seq.* (“Clean Water Act” or “CWA”), committed by the City of Sacramento and/or the Sacramento Utilities Department (collectively “Sacramento”). As specifically explained below, this letter notifies Sacramento of its ongoing violations of: (1) section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a) for point source discharges of pollutants to waters of the United States; and (2) *Waste Discharge Requirements Cities of Citrus Heights, Elk Grove, Folsom, Galt, Rancho Cordova, Sacramento, and County of Sacramento Storm Water Discharges from Municipal Separate Storm Sewer System Sacramento County* (MS4), NPDES Permit No. CAS082597, Order No. R5-2002-0206 California Regional Water Quality Control Board Central Valley Region (“2002 MS4 Permit”), and (3) *Waste Discharge Requirements Cities of Citrus Heights, Elk Grove, Folsom, Galt, Rancho Cordova, Sacramento, and County of Sacramento Storm Water Discharges from Municipal Separate Storm Sewer System Sacramento County* (MS4), NPDES Permit No. CAS082597, Order No. R5-2008-0142 California Regional Water Quality Control Board Central Valley Region (“2008 MS4 Permit”).¹

Section 505(b) of the Clean Water Act, 33 U.S.C. § 1365(b), requires that sixty (60) days prior to the initiation of a civil action under Section 505(a) of the Clean Water Act, 33 U.S.C. § 1365(a), a citizen must give notice of his/her intent to file suit. Notice must be given to the alleged violator, the United States Environmental Protection Agency (“EPA”), the State water agency in the State in which the violations occur, and if the alleged violator is a corporation, to

¹ In 2004, the Storm Water Quality Improvement Plan (SQIP) required under Provision C.2 of the 2002 MS4 Permit was approved by the Central Valley Regional Water Quality Control Board. See Approval of Storm Water Quality Improvement Plan for Cities of Citrus Heights, Elk Grove, Folsom, Galt, Rancho Cordova, and Sacramento, Municipal Separate Storm Sewer Systems NPDES Permit, Resolution No. R5-2004-0140. The SQIP is an enforceable component of the 2002 MS4 Permit.

the registered agent for the corporation. 33 U.S.C. § 1365(b)(1)(A), *see also* 40 C.F.R. § 135.2.

As required by the Clean Water Act, Sacramento is hereby placed on formal notice that, after the expiration of sixty (60) days from the date of this Notice of Violations and Intent to File Suit (“Notice Letter”), CSPA intends to file suit in federal District Court pursuant to Section 505(a) of the Clean Water Act, 33 U.S.C. §1365(a), against the persons responsible for the violations described in this Notice Letter. Specifically, CSPA will seek injunctive relief pursuant to CWA Sections 505(a) and (d), 33 U.S.C. §1365(a) and (d), and declaratory relief and such other relief permitted by law to remedy the CWA violations outlined below. CSPA will also seek civil penalties pursuant to Sections 505(a) and 309(d) of the Clean Water Act, 33 U.S.C. §§ 1319(d) and 1365(a), and the EPA Regulation, Adjustment of Civil Monetary Penalties for Inflation, set forth at 40 C.F.R. § 19.4. These provisions of law authorize civil penalties for each separate violation of the Clean Water Act occurring between March 15, 2004 and January 12, 2009 of up to \$32,500 per day per violation, and \$37,500 per day per violation for all Clean Water Act violations occurring after January 12, 2009. Finally, CSPA will seek to recover its litigation costs, including attorneys’ and experts’ fees, pursuant to CWA Section 505(d), 33 U.S.C. § 1365(d).

I. ORGANIZATIONS GIVING NOTICE OF CLEAN WATER ACT VIOLATIONS

CSPA advocates for the restoration and protection of degraded California fisheries. CSPA accomplishes its mission through seeking administrative and legal remedies by monitoring, participation in agency proceedings, and enforcement. CSPA’s address and contact information is as follows:

California Sportfishing Protection Alliance
Bill Jennings, Executive Director
3536 Rainier Avenue
Telephone: 209-464-5067
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CSPA members use and enjoy the waters receiving the illegal discharges identified herein, including but not limited to the Sacramento-San Joaquin River Delta (“Delta”), the Sacramento River, and the American River. CSPA’s members fish and enjoy the wildlife in and around these waters. Information available to CSPA indicates that Sacramento discharges sewage and associated pollutants to these waters. These discharges of sewage and associated pollutants degrade water quality and harms aquatic life in these waters. Further, Sacramento’s discharges of sewage and associated pollutants are ongoing and continuous. As a result, CSPA’s members’ use and enjoyment of these waters has been and continues to be adversely impacted. In addition, Sacramento discharges to area businesses, residents’ yards and basements, and municipal sidewalks, streets and other paved areas, which exposes members of CSPA (as well as members of the general public) to substantial health risks.

II. THE COLLECTION SYSTEM, THE MUNICIPAL SEPARATE STORM SEWER SYSTEM, AND THE ENTITY RESPONSIBLE FOR THE ALLEGED VIOLATIONS

1. Sacramento's Sewage Collection System

Sacramento's sewage collection system ("Collection System") serves a population of approximately 300,000.² The Collection System conveys sewage from within Sacramento to the sewage collection system owned and operated by the Sacramento Regional County Sanitation District, where it is subsequently delivered to the Sacramento Regional County Wastewater Treatment Plant ("WWTP"). The Collection System consists of 1,000 miles of pipeline, including 560 miles of gravity collection pipe and 6 miles of force mains. The Collection System consists of pipes and other manmade conveyances that are point sources under the Clean Water Act. *See* 33 U.S.C. § 1362(14). Information available to CSPA indicates that much of the Collection System was constructed between 1940 and 1970 but that older sections of the Collection System were constructed in the late 1800's and early 1900's. The Collection System is composed predominately of vitrified clay and concrete reinforced pipe.

2. Sacramento's Municipal Separate Storm Sewer System and the MS4 Permits

Sacramento's municipal separate storm sewer system ("MS4") covers the areas also served by the Collection System. An MS4 is a system of conveyances that includes but is not limited to streets, curbs, gutters, other paved surfaces, catch basins, ditches, man-made channels, catch basins and/or storm drains owned or operated by a State, city, or town that is designed or used for collecting or conveying storm water and that discharges to waters of the United States³ *See* 40 C.F.R. 122.26(b)(8)(i)-(ii); *see also* 40 C.F.R. 122.26(b)(18). Sacramento's MS4 contains numerous storm drain inlets that lead to underground storm drain pipes, which discharge to the Sacramento River, the American River, and/or their local tributaries. Pollutants in SSOs that enter the MS4s discharge to local waterways. Discharges to the MS4 ultimately make their way to the Sacramento River and/or the Delta. *Id.*

Clean Water Act Section 402(p), 33 U.S.C. § 1342(p), establishes a framework for regulating municipal storm water discharges under NPDES permits. Section 402(p) of the CWA requires dischargers of municipal storm water to obtain and comply with an NPDES permit. 33 U.S.C. § 1342(p)(2). Section 402(p)(3)(B) of the CWA sets forth the requirements that must be in all MS4 permits. 33 U.S.C. § 1342(p)(3)(B). The 2002 and 2008 MS4 Permits regulate discharges into and from the MS4 within the Sacramento Urbanized Area.⁴ *See* 2002 MS4 Permit; 2008 MS4 Permit.

Sacramento is among seven municipal entities that have joined together and sought

² Sacramento also owns and operates a combined sewer collection system, which collects and conveys sewage and storm water runoff in certain parts of the City. The combined sewer collection system is not at issue in this notice letter.

³ An MS4 is further defined as a sewer system that is not a combined sewer, and is not part of a Publicly Owned Treatment Works. *See* 40 C.F.R. 122.26(b)(8)(iii)-(iv).

⁴ The Sacramento Urbanized Area consists of the cities of Sacramento, Citrus Heights, Elk Grove, Folsom, Galt, Rancho Cordova, and unincorporated areas of Sacramento County. *See* 2008 MS4 Permit, Fact Sheet, IV, Background, B. Storm Drain System.

coverage for their municipal storm water discharges under an MS4 permit. Along with the County of Sacramento and the cities of Folsom, Elk Grove, Citrus Heights and Galt, Sacramento submitted an NPDES permit application and was granted an NPDES permit in 1990, which was reissued in 1996. 2008 MS4 Permit, Fact Sheet at 11. This MS4 permit was again reissued in 2002.⁵ *Id.* In 2007, Sacramento and its joint permittees submitted a Report of Waste Discharge (“2007 ROWD”) and requested reissuance of the MS4 Permit. The MS4 Permit was again reissued in 2008. The 2002 and 2008 MS4 Permits are the MS4 Permits being violated as alleged in this Notice Letter.

3. The Owner and Operator of the Collection System and the MS4

The City of Sacramento is a municipality incorporated under the laws of the State of California. The Sacramento Department of Utilities has offices at 1395 35th Avenue, Sacramento, California 95822. The City of Sacramento is the owner and/or operator of the Collection System and the MS4. The City of Sacramento, through its Department of Utilities, operates and maintains the Collection System, tasks which include responding to citizen complaints of SSOs, and conducting routine maintenance, cleaning, and inspection of the collection system. The Department of Utilities also operates and maintains the MS4.

Sacramento is a permittee on both the 2002 and 2008 MS4 Permits. Pursuant to the MS4 Permits, Sacramento has jurisdiction over and/or operation and maintenance responsibilities for the MS4 within the city limits. *See* 2002 MS4 Permit, Provisions, C.4.a.; 2008 MS4 Permit, Provisions, D.4.a. Sacramento is required to comply with all provisions of the MS4 Permits. 2002 MS4 Permit, Provisions, C.1.a.; 2008 MS4 Permit, Provisions, D.1.a.

III. BACKGROUND AND ENVIRONMENTAL IMPACTS FROM THE ILLEGAL DISCHARGES

A. The Collection System, and MS4, and the Waters Receiving Discharges

The Collection System and the MS4 run through several major watersheds that drain to the Delta and its tributaries, including but not limited to the Sacramento River, American River, Arcade Creek, Chicken Ranch Slough, Strong Ranch Slough, and unnamed tributaries. Information available to CSPA indicates that SSOs from the Collection System, and the pollutants associated with these SSOs, discharge to these waters, which flow to the Delta.

The Delta is the largest Pacific Coast estuary in both North and South America. The Delta is the confluence of five major rivers and numerous creeks and sloughs. This maze of finger-like waterways ebbs and flows through prime California natural habitat and farmland. The Delta is also the primary source of fresh water supply for two-thirds of California’s residents. The preservation of this natural resource is essential. The Delta and its tributaries also provide special aesthetic and recreational significance for people living in the surrounding communities. With 700 miles of channels, nearly all navigable, recreation in the Delta is mainly water-oriented. Major recreational activities supported by the Delta include as fishing, water-skiing, sailing, cruising, personal watercraft, canoeing, kayaking, swimming, and windsurfing.

⁵ The City of Rancho Cordova was incorporated in 2003 and is now the seventh permittee on the MS4 Permits.

These activities depend upon water quality and habitat preservation in the Delta. The growing urbanization of the Delta area makes these recreational and aesthetic uses even more important to the quality of life of the Delta residents.

Furthermore, the Delta fosters the commercial fishing industry in California and beyond. Commercial fishers and sport fishers alike continue to suffer from the constant degradation of the Delta through illegal discharges, including SSOs. The Delta's once-abundant and varied fisheries and species habitat have been drastically diminished by pollution.

B. Pollutants in Sewage and Their Impacts to the Environment and Human Health

Spills of raw sewage and discharges of sewage-contaminated storm water harm the Delta and its tributaries and pose a serious risk to fisheries, wildlife habitat, and human health. In addition to human waste and bacteria, sewage contains heavy metals, as well as chemicals that cause cancer or reproductive toxicity. These metals and chemicals come from solvents, detergents, cleansers, inks, pesticides, paints, pharmaceuticals, and other materials used by households and businesses, and then discarded to sewage collection systems.⁶ High concentrations of these pollutants are typically found in discharges of raw sewage. The intensive use of the Delta for commercial, sport fishing, and water-contact recreation increases the likelihood of direct human contact with spilled sewage and the pollutants it contains.

Sewage pollution also affects people who eat fish caught in the Delta and its tributaries. Toxic chemicals are concentrated in the Delta's food web, which means that contaminants absorbed by plankton are magnified in fish and birds farther up the food chain and ultimately ingested by human consumers. Contamination of fish is particularly harmful to ethnic and economic minorities, who typically eat an above-average amount of local fish.

Many of the water bodies discussed in this Notice Letter are listed on the State of California's 2006 Clean Water Act Section 303(d) list of impaired water bodies. A water body that is listed as impaired cannot support the designated beneficial uses for that water body.⁷ The Sacramento and American Rivers are listed as impaired for mercury and unknown toxicity. Arcade Creek is listed as impaired for copper. The Delta is listed as impaired for chlordane, dichlorodiphenyltrichloroethane ("DDT"), dieldrin, dioxin compounds, exotic species, furan compounds, mercury, nickel, polychlorinated biphenyls ("PCBs"), and selenium. Many of these pollutants are found in Sacramento's discharges of raw sewage. Therefore, by discharging excessive levels of these pollutants that contribute to the continued impairment of the Delta and

⁶ See People for Puget Sound, "Puget Sound Georgia Basin Sewage Report," February 1995; see also Excerpt from "Safe Substitutes at Home: Non-Toxic Household Products," Gary A. Davis and Em Turner, University of Tennessee-Knoxville Waste Management Institute, es.epa.gov/techinfo/facts/safe-fs.html; see also Frick, E., et al, Presence of Pharmaceuticals in Wastewater Effluent and Drinking Water, Metropolitan Atlanta, Georgia July-September 1999, Proceedings of the 2001 Georgia Water Resources Conference, March 26-27, 2001.

⁷ The designated uses of the water bodies receiving Sacramento's discharges include, but are not limited to, municipal and domestic use, warm and cold freshwater habitat, and warm and cold fish migration. See *Water Quality Control Plan ("Basin Plan") for the Sacramento River and San Joaquin River Basins*, California Regional Water Quality Control Board, Central Valley Region (September 2009), Table II-1.

its tributaries, Sacramento's violations of the Clean Water Act have directly harmed CSPA's members' use and enjoyment these waters.

SSOs that do not directly reach waterways or the Delta still pose significant health risks by depositing raw sewage in public streets, public buildings and grounds, and private yards and homes. SSOs contain large quantities of bacteria, viruses, mold spores, and protozoa. Exposure to raw sewage can cause a variety of health problems, including gastroenteritis, respiratory illness, ear, nose, and throat problems, and skin rashes. Mold spores can establish an ecological niche when they are carried onto a homeowner's property during an overflow, creating an ongoing health risk from chronic exposure. Sewage contaminated waters also may provide a breeding ground for mosquitoes. Residential sewage overflows also diminish property values and impose severe nuisance on local residents.

CSPA brings this action to compel Sacramento's compliance with the Clean Water Act, including seeking injunctive relief to cease the ongoing violations of the CWA, to pay penalties for their violations of the Clean Water Act, as well as seek all other applicable relief authorized by federal law.

IV. CLEAN WATER ACT VIOLATIONS

A. Sanitary Sewer Overflows: Unpermitted Sewage Discharges in Violation Clean Water Act Section 301(a), 33 U.S.C. § 1311(a)

Clean Water Act Section 301(a) provides that "the discharge of any pollutant by any person shall be unlawful" unless the discharger is in compliance with the terms of an NPDES permit. 33 U.S.C. § 1311(a). Sacramento discharges sewage, which contains numerous pollutants. At no point has Sacramento obtained a CWA permit that authorizes the discharge of pollutants from the Collection System to waters of the United States. Therefore, each and every time Sacramento discharges pollutants, including discharges of sewage and the pollutants in SSOs, from a point source to waters of the United States is a separate violation of Section 301(a) of the Clean Water Act.

Information available to CSPA, including Sacramento's internal spill reporting and response documents and spills reported to the California Integrated Water Quality Systems, indicates that Sacramento has had at least 364 SSOs from the Collection System since December 29, 2005, or 12.5 SSOs per 100 miles of sewer pipes per year.⁸ See Exhibit A (table identifying dates and locations of these SSOs). Of these 360 SSOs, information available to CSPA indicates that 323 reached the MS4 and waters of the United States. See Exhibit B (table setting forth dates and locations of these 323 SSOs). The MS4 is a point source and the system subsequently discharges to waters of the United States including, but not limited to, the Sacramento River, the American River, Arcade Creek, and Steelhead Creek. Thus SSOs from the Collection System that reach the MS4 ultimately discharge to waters of the United States. CSPA hereby puts

⁸ Information available to CSPA indicates that well run collection systems in California average between 0-3 SSOs per 100 miles of pipe per year, average systems have between 4-6 SSOs per 100 miles of pipe per year, and poorly run systems exceed 10 SSOs per 100 miles of pipe per year.

Sacramento on notice that all discharges of pollutants from a point source to waters of the United States, including Sacramento's SSOs that discharge directly to waters and those SSOs that enter the MS4 and then discharge to waters, are violations of Section 301(a) of the Clean Water Act.

Information available to CSPA also indicates that Sacramento has been underreporting the number of SSOs that take place from Sacramento's collection system and that Sacramento lacks an adequate monitoring program to detect, report, and address SSOs and their impacts. CSPA believes more SSOs will be discovered through this enforcement action. CSPA, therefore, specifically puts Sacramento on notice that all unpermitted point source discharges of pollutants resulting from SSOs, whether specifically reported or not, will be included in this litigation. CSPA will include additional violations including, but not limited to, SSOs occurring after the date of this Notice Letter when additional information becomes available.

Sacramento's unpermitted point source discharges of pollutants resulting from SSOs from the Collection System in violation of the Clean Water Act are ongoing and continuous. Every day and/or occasion that Sacramento have discharged and continues to discharge pollutants resulting from SSOs from point sources directly to waters of the United States or to waters of the United States through the MS4 is a separate and distinct violation of the Clean Water Act. Sacramento's violations will continue every day and/or occasion it discharges pollutants resulting from SSOs in violation of Section 301(a) of the Clean Water Act. Sacramento is subject to penalties for all violations of the Clean Water Act occurring in the five (5) years prior to the date of this Notice Letter.

B. Discharges of Sewage to the Sacramento MS4 in Violation of the 2002 and 2008 MS4 Permits and the Clean Water Act

The MS4 Permits contain prohibitions and limitations on discharges to Sacramento's MS4. 2002 MS4 Permit, Discharge Prohibition, A.4; 2008 MS4 Permit, Discharge Prohibition, B.1. Specifically, Discharge Prohibition A.4 of the 2002 MS4 Permit and Discharge Prohibition B.1 of the 2008 MS4 Permit require Sacramento to effectively prohibit the discharge of non-storm water (material other than storm water) into the Sacramento MS4. As explained below, Sacramento has violated and continues to violate this provision by failing to effectively prohibit the discharge of SSOs from the Collection System into the MS4.

SSOs that enter Sacramento's MS4 are not storm water but rather raw sewage. Information currently available to CSPA indicates that there have been discharges of SSOs, or non-storm water, into Sacramento's MS4 on 323 occasions since December 29, 2005. *See* Exhibit B. This large number of SSOs, among other things, indicates that Sacramento is in consistent and chronic violation of the 2002 and 2008 MS4 Permit requirements to effectively prohibit discharges to the MS4. *See* 2002 MS4 Permit, Discharge Prohibition, A.4; 2008 MS4 Permit, Discharge Prohibition, B.1. Violations for failing to effectively prohibit SSO discharges to the MS4 have occurred every day since December 29, 2005 and will continue every day that Sacramento fails to effectively prohibit SSOs to the MS4.⁹ Information available to CSPA

⁹ At a minimum, Sacramento violated Discharge Prohibition A.4 of the 2002 MS4 Permit and has violated and continues to violate Discharge Prohibition B.1 of the 2008 MS4 Permit every time an SSO from the Collection System enters the MS4.

indicates that Sacramento has been underreporting and/or misreporting the number of SSOs that enter the MS4 from the Collection System. CSPA will add additional violations by Sacramento as they are discovered in the course of this litigation. CSPA puts Sacramento on notice that each SSO that all discharges into Sacramento MS4 will be included in this enforcement action.

Every day Sacramento failed and continues to fail to effectively prohibit non-storm water discharges in the form of SSOs to the MS4 is a separate and distinct violation.¹⁰ *See* 2002 MS4 Permit, Discharge Prohibition, A.4; 2008 MS4 Permit, Discharge Prohibition, B.1. Sacramento's violations of these permit requirements will continue every day and/or occasion SSOs enter Sacramento's MS4 in violation of the requirements of either the 2002 or 2008 MS4 Permit and the CWA. Sacramento is subject to penalties for all violations of the Clean Water Act occurring in the five (5) years prior to the date of this Notice Letter.

C. Discharges of Pollutants from SSOs from Sacramento's MS4 in Violation of the 2002 and 2008 MS4 Permits and the Clean Water Act

The 2002 and 2008 MS4 Permits also prohibit discharges from the MS4 that contain pollutants not reduced to the maximum extent practicable. 2002 MS4 Permit, Discharge Prohibitions A.3; 2008 MS4 Permit, Discharge Prohibitions A.3. As explained below, Sacramento has violated and continues to violate its duty under the 2002 and 2008 MS4 Permits by discharging pollutants associated with SSOs from the MS4 that have not been reduced to the maximum extent practicable.

The bacteria and other components of raw sewage are pollutants. SSOs from the Collection System have discharged to the MS4 over 323 times in the last five years. *See* Exhibit B. The pollutants from these SSOs enter the MS4 and are either immediately discharged from the MS4 to local waterways, or are discharged to local waterways during the next precipitation event that produces a discharge from the MS4. Sacramento's continued failure to prevent SSOs from reaching the MS4 results in a failure to meet its obligation to reduce the discharge of these pollutants from the MS4 to the maximum extent practicable. Sampling performed by Sacramento pursuant to its obligations under the 2002 and 2008 MS4 Permits indicates that its discharges of storm water from the MS4 contain pollutants associated with SSOs. Specifically, the Annual Reports submitted by Sacramento, as well as the 2007 ROWD, identify the specific dates and locations of discharges from the MS4 within Sacramento's jurisdiction that were sampled by Sacramento since December 29, 2005. CSPA puts Sacramento on notice that each of these discharges, which contained pollutants from SSOs not reduced to the maximum extent practicable, is a violation of Discharge Prohibition A.3 of the 2002 or Discharge Prohibition A.3 of the 2008 MS4 Permit.

CSPA therefore notifies Sacramento that every discharge of pollutants associated with SSOs from the MS4 is a violation of Discharge Prohibition A.3 of the 2002 or Discharge Prohibition A.3 of the 2008 MS4 Permit. Sacramento's discharges of pollutants associated with SSOs that have not been reduced to the maximum extent practicable from its MS4 are continuing and ongoing. Additional discharges of pollutants from SSOs that violate Discharge Prohibition

¹⁰ At a minimum, every time that non-storm water in the form of SSOs enters Sacramento's MS4 is a separate and distinct violation. *See* 2002 MS4 Permit, Discharge Prohibition, A.4; 2008 MS4 Permit, Discharge Prohibition, B.1.

A.3 of the MS4 Permits will be added to this litigation as they are discovered.

Every time Sacramento discharges pollutants associated with SSOs from its MS4 that are not reduced to the maximum extent practicable is a separate and distinct violation. *See* 2002 MS4 Permit, Discharge Prohibitions A.3; 2008 MS4 Permit, Discharge Prohibitions A.3. Sacramento's violations will continue every day and/or occasion it discharges pollutants associated with SSOs from its MS4 that are not reduced to the maximum extent practicable in violation of the requirements of the 2002 or 2008 MS4 Permits and the CWA. Sacramento is subject to penalties for all violations of the Clean Water Act occurring in the five (5) years prior to the date of this Notice Letter.

V. CONCLUSION

Upon expiration of the 60-day notice period, CSPA will file a citizen suit enforcement action pursuant to Section 505(a) of the Clean Water Act for the above-referenced violations. During the 60-day notice period, however, CSPA is willing to discuss effective remedies for the violations noted in this letter. If Sacramento wishes to pursue such discussions, we suggest that it initiates those discussions immediately.

CSPA has retained legal counsel to represent it in this matter. Please direct all communications to Lawyers for Clean Water, Inc. at the address/number below:

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Sincerely,



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