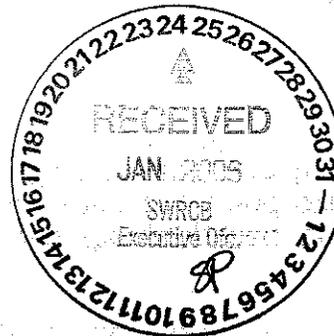


CITY OF BRADBURY

Incorporated July 26, 1957

Tam Doduc, Chair, and Members
State Water Resources Control Board
Executive Office
1001 I Street, 24th Floor
Sacramento, California 95814
Attn: Selica Potter, Acting Clerk to the Board



SSO Hearing: 2/8/06

Dear Chairwoman Doduc and Members:

COMMENT LETTER - 1/19/06 PUBLIC HEARING FOR SSORP

This is written on behalf of the City of Bradbury to express opposition to the Statewide General Waste Discharge Requirements (WDR) for Wastewater Collection System Agencies and the accompanying Monitoring and Reporting Program (MRP) in their current form. The City of Bradbury is supportive of the goals of the State Water Resources Control Board (SWRCB) to implement the Sanitary Sewer Overflow Reduction Program to reduce the number and volume of Sanitary Sewer Overflows (SSOs) throughout the state.

However, the City of Bradbury believes the projected \$72 annual cost per household to implement the Statewide WDR that is shown in the Fact Sheet may underestimate the true cost for smaller cities such as ours. The State should attempt to identify a source of funding to support these new costs rather than simply requiring the cities to enact rate increases to cover the costs. Most importantly, fines or third party litigation due to SSOs that occur even after full SSMP implementation and full compliance with WDR and MRP requirements should not further increase these additional costs. The WDR must strongly differentiate between negligent and non-negligent SSOs, and must provide our residents with protection against the cost impact of fines and lawsuits based on SSOs that occur even after our collection system is managed, operated and maintained according to the standards and requirements established by this new regulatory program.

Additionally, the City of Bradbury believes the proposed time schedule for implementation of the various program elements is too short and overly prescriptive. The City of Bradbury is a small contract City that depends on the County Sewer Maintenance District for sewer maintenance services. The City's small staff lacks the technical expertise needed to develop the necessary plans without county assistance.

Tam Doduc, Chair, and Members

-2-

The City of Bradbury believes more time should be afforded and separate deadlines for individual program elements should be eliminated.

The City of Bradbury strongly urges the SWRCB not to adopt the WDR and MRP without cost support, protection for our ratepayers from potentially unfair and unreasonable regulatory fines and third party litigation, and additional time for program implementation.

Very truly yours,

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

Jennifer Vasquez
City Manager
City of Bradbury

cc: Bryan Brock, SWRCB staff