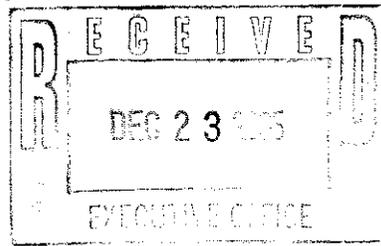


City Manager's Office
(562) 220-2222



DIANE J. MARTINEZ
Mayor
DARYL HOFMEYER
Vice Mayor
GENE DANIELS
Councilmember
MANUEL E. GUILLEN
Councilmember
PEGGY LEMONS
Councilmember

SSO Hearing - 2/8/06

December 19, 2005

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

Re: Opposition to WDR and MRP in Their Current Form

Dear Chairwoman Doduc and Members:

This is written on behalf of the City of Paramount 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 Paramount 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, as you know in your Fact Sheet, the projected annual cost of implementing the Statewide WDR is approximately \$870 million, resulting in an average annual cost per household of \$71.86. For many households, this added cost will be manageable. However, the cost per household in some cities will undoubtedly be much higher. For disadvantaged households in cities experiencing higher-than-average SSMP implementation costs, the added costs could pose a significant burden. The costs experienced by these households should not be further increased by fines or third party litigation due to SSOs that occur even after full SSMP implementation and full compliance with WDR and MRP requirements. The WDR must strongly differentiate between negligent and non-negligent SSOs, and should provide the citizens of California with protection against fines and lawsuits based on SSOs from collection systems managed, operated and maintained according to the standards and requirements established by this new regulatory program.

The City of Paramount strongly urges the SWRCB not to adopt the WDR and MRP without the inclusion of language which would offer some protection to the citizens of California from potentially unfair and unreasonable regulatory fines and third party litigation.

CITY OF PARAMOUNT

Linda Benedetti-Leal
City Manager