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Councilman



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January 24, 2006

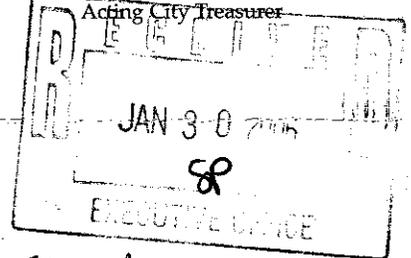
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Director of Environmental Health

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Director of Community Services

SHARON L. DUCKWORTH
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SSO Hearing
LATE

Ms. Tam Doduc, Chair
State Water Resources Control Board
Executive Office
1001 I Street, 24th Floor
Sacramento, CA 95814

SUBJECT: Statewide General Waste Discharge Requirements for Wastewater Collection Systems (WDR) – Comment Letter

Dear Ms. Doduc:

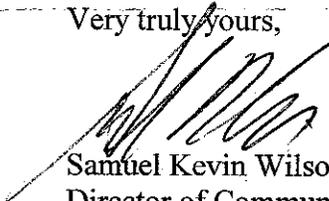
The City of Vernon is supportive of the goals of the State Water Resources Control Board (Board) in its effort to implement the Sanitary Sewer Overflow Reduction Program to reduce the number and volume of sanitary sewer overflows throughout the State but requests the Board consider the following comments:

1. The Statewide General Waste Discharge Requirements for Wastewater Collection Systems Order does not provide protection from fines or third party litigation for sanitary sewer overflows (SSOs) from wastewater collection systems that have fully implemented a Sanitary Sewer Management Plan (SSMP) and fully comply with the WDR and Monitoring and Reporting Program (MRP). The WDR must clearly differentiate between negligent and non-negligent SSOs and must provide our residents with protection against the cost impact of fines and lawsuits based upon SSOs that occur even after our collection system is managed, operated and maintained according to the standards and requirements of the WDR.
2. In addition, the City of Vernon believes the proposed time schedule for implementation of the various program elements is too short and overly prescriptive. The 12 month implementation time for our City should be extended to allow an effective program to be developed and implemented.

3. The cost analysis for the implementation of the program underestimates the cost of implementation for a small city like the City of Vernon with a much older collection system. The WDR and MRP are estimated by Board Staff to cost hundreds of millions of dollars on a statewide basis but the costs may be much more. This cost should be shared by the State of California as well as the cities that have wastewater collection systems. The Board must recognize that multi-millions of dollars in cost will have a significant impact on other services the cities provide unless the State of California can secure additional funding to implement this program.

If you require additional information, please contact Sherwood Natsuhara of my staff at (323) 583-8811, Ext. 305.

Very truly yours,



Samuel Kevin Wilson, P.E.
Director of Community Services & Water

SKW/sn