



"Preserving Our Past, Enriching Our Present, Building Our Future"

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January 25, 2006

Selica Potter, Acting Clerk to the Board  
State Water Resources Control Board  
Executive Office  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814



SSO Hearing: 2/8/06

Re: COMMENT LETTER – 1/19/06 PUBLIC HEARING FOR SSORP

Dear State Water Resources Control Board:

On behalf of the City of Jackson City Council, please accept these comments regarding the proposed Statewide General Waste Discharge Requirements for Wastewater Collection System Agencies. While the City Council is supportive of the program's goal, it is our opinion that the current permitting and regulatory activities for wastewater systems achieve the same goals and ensure that the public health is protected.

The City of Jackson already works proactively to prevent sanitary sewer overflows. We have worked with our self-insurance JPA to update our response plan and made significant improvements to the collection system to minimize overflow incidents. It appears that the proposed waste discharge requirements do not differentiate between negligent and non-negligent overflow incidents and there is no protection against fines or lawsuits whether a system is managed, operated and maintained according to the standards and requirements established by this new regulatory program.

Most concerning to our City Council was the cost to implement these new regulations. Though the Board staff have estimated a "very manageable sum" cost of \$6.00 per month per household, our community includes a high percentage of retired, fixed-income senior citizens for whom even this amount is a burden. It is also probable that the Orange County based estimate does not take into account the much smaller customer base and other variables facing hilly foothill communities such as Jackson. The cost of this program far outweighs the potential benefit.

The bottom line is that our wastewater collection system is sufficiently regulated. We diligently work to ensure that overflow incidents are minimized and respond with utmost urgency when the rare incident occurs. Please re-consider the need for this additional program and carefully review the concerns submitted by other wastewater agencies regarding the proposed regulations.

Sincerely,

Alfred A. Nunes  
Mayor

cc: League of California Cities