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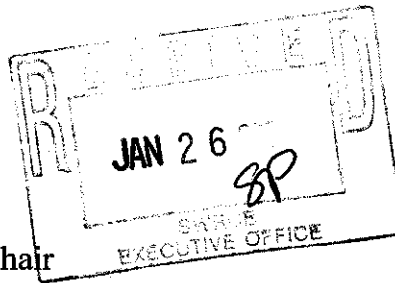
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January 18, 2006



SSO Hearing: 2/8/06

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

Attention: Selica Potter, Acting Clerk to the Board

SUBJECT: PROPOSED STATEWIDE GENERAL WASTE
DISCHARGE REQUIREMENTS (WDR) FOR
WASTEWATER COLLECTION SYSTEMS: COMMENT
LETTER

Dear Chairperson Doduc:

This letter is in response to your December 7, 2005 request for written comments regarding the abovementioned requirements. After a review and consultation with other affected public agencies, the City of Pico Rivera expresses its opposition to the proposed requirements in their current form.

Although we support the efforts of the State Water Resources Control Board (SWRCB) to reduce the number and volume of sanitary sewer overflows, we cannot support the proposed requirements for the following reasons:

- The projected annual cost of implementing the Statewide WDR is approximately \$870 million, or more than \$70 per household.
- These costs could be increased by fines or third-party lawsuits due to sanitary sewer overflows that occur even after full implementation and full compliance with the new requirements.
- The WDR should strongly differentiate between negligent and non-negligent sanitary sewer overflows.

For these reasons, the City of Pico Rivera urges the SWRCB not to adopt the WDR without the inclusion of language which would offer protection to the citizens of California from potentially unfair and unreasonable regulatory fines and third party litigation.

Letter to Tam M. Doduc, Chair, SWRCB
PROPOSED STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS (WDR)
FOR WASTEWATER COLLECTION SYSTEMS: COMMENT LETTER

Page 2

If you need additional information regarding this matter, please contact me at (562)
801-4368.

Sincerely,



Charles P. Fuentes
City Manager

CF:MM:lg

cc: Mayor and Council
Assistant City Manager
Acting Director of Public Works
James F. Stahl, County Sanitation Districts