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Tam Doduc, Chair, and Members
State Water Resources Control Board
Executive Office
1001 1 Street, 24th Floor
Sacramento, California 95814
Attn: Selica Poter, Acting Clerk to the Board

SSO Hearing
LATE

Dear Chairwoman Doduc and Members:

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

This is written on behalf of the City of Temple City 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 Temple City 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. The City as had an active Industrial Waste and grease prevention programs have been in place since the 1950's

Under the proposed regulations, the City of Temple City may be subject to an additional \$72 annual cost per household to implement the Statewide WDR. As a small city, this figure may actually underestimate the true cost. Even if the cost projection proves accurate, it does represent a very significant cost increase to be borne by our ratepayers. 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, these additional costs 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 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 Temple City believes the proposed time schedule for implementation of the various program elements is too short and overly prescriptive. In particular, for our city, with a population falling between 10,000 and 100,000 people, development and implementation of a comprehensive Overflow Emergency Response Program within 12 months, which will require new equipment, personnel and training, would be difficult. The City of Temple City believes more time should be afforded and separate deadlines for individual program elements should be eliminated.

The City of Temple City 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,

Chalres R. Martin
City Manager/Administrator
City of Temple City