



MEMBER AGENCIES

- City of Cloverdale
- City of Cotati
- City of Healdsburg
- City of Rohnert Park
- City of Santa Rosa
- City of Ukiah
- County of Sonoma
- Mendocino County Water Agency
- Mendocino County Inland Water and Power Commission
- Sonoma County Water Agency
- Town of Windsor

DAVE RICHARDSON
Executive Director

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Ukiah, CA 95482
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January 24, 2006

Selica Potter, Acting Clerk to the Board
State Water Resources Control Board
Executive Office
1001 I Street, 24th Floor
Sacramento, California 95814



Subject: COMMENT LETTER – 1/19/06 Public Hearing for SSORP

Dear Ms. Potter:

This letter summarizes comments of the Russian River Watershed Association (RRWA) with regard to the current proposal of the State Water Resources Control Board (SWRCB), set forth in "Statewide General Waste Discharge Requirements for Wastewater Collection System Agencies," December 5, 2005 (Statewide General WDR).

The RRWA is a group of cities and other public agencies working together cooperatively to coordinate regional programs for clean water, fisheries restoration, and watershed enhancement. RRWA participants are developing projects to improve the watershed and to help local governments meet requirements for clean water and other needs collectively at reduced cost. Several of our member agencies operate collection systems within the Russian River area, and therefore have a direct interest in the Statewide General WDR that will be implemented by the SWRCB.

While the RRWA reviewed the entire Statewide General WDR, the comments provided below represent the common issues of interest and opinions held by all of RRWA's eleven member agencies. It should be noted that RRWA member agencies may have their own perspectives related to other aspects of the Statewide General WDR that are not contained in this letter.

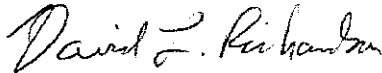
Our comments are as follows:

- RRWA supports the goals of the SWRCB to implement the Sanitary Sewer Overflow Reduction Program to reduce the number and volume of Sanitary Sewer Overflows (SSOs) throughout the state.
- In general, we think the proposed time schedule for implementation of the various program elements is too short and overly prescriptive.
- The Statewide General WDR must strongly differentiate between preventable and unavoidable SSOs, and must provide cities and their 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.

- We have grave concerns about the potential impacts of fines or third party litigation. The program costs should not be further impacted by fines or third party litigation due to SSOs that occur even after full SSMP implementation and full compliance with WDR and Monitoring and Reporting Program (MRP) requirements.
- The projected \$72 annual cost per household to implement the Statewide General WDR that is shown in the Fact Sheet may underestimate the true cost for small towns and cities such as those within RRWA. Even if the cost projection proves accurate, it does represent a very significant cost increase to be borne by our ratepayers.
- We strongly urge the SWRCB not to adopt the Statewide General WDR and MRP unless protection for agency ratepayers from potentially unfair and unreasonable regulatory fines and third party litigation is added, and additional time for program implementation is built into the compliance schedule.
- We would like clarification on whether every component of an SSMP needs to be stamped by an engineer or just the components that require engineering analysis.

We appreciate your consideration of our comments in preparing the Final Statewide General WDR. If you have any questions or would like to discuss the issues raised in this letter, please feel free to call me at (925) 299-6733.

Sincerely,



Dave Richardson
Executive Director, Russian River Watershed Association

cc: RRWA BOD
Bryan Brock, SWRCB