



THE CITY OF ARTESIA, CALIFORNIA

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"Service Builds Tomorrow's Progress"



SSO Hearing: 2/8/06

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

Attention: Selica Potter, Acting Clerk to the Board

Dear Chair Doduc and Members:

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

The City of Artesia in support of the Los Angeles County Department of Public Works submits this letter to express its opposition to the proposed Statewide General Waste Discharge Requirements (WDR) and the accompanying Monitoring and Reporting Program, in their current form.

We are in support of the State Water Resources Control Board (SWRCB) initiative to implement a Sanitary Sewer Overflow Reduction Program to reduce the number and volume of Sanitary Sewer Overflows throughout the State. However, there are some important issues in the draft proposal, which raised very serious concerns, and as such, we cannot support the adoption in its current form. Specifically, the last of Affirmative Defense language; unreasonable deadline for implementation; and the extremely high cost of implementation.

The City of Artesia in support of the Los Angeles County Department of Public Works strongly appeals to the SWRCB not to adopt the proposed Statewide General Waste Discharge Requirements and the accompanying Monitoring and Reporting Program, without 1) the Affirmative Defense provisions or at minimum stronger enforcement discretionary language in the documents to better protect the Districts and ultimately the District's customers from unfair and unreasonable potential fines and third-party litigation, 2) allowing additional time for wastewater collection system agencies to successfully develop and implement the program, and 3) an effort by the State to defray the costs.

Very truly yours,

Handwritten signature of Maria Dadian
Maria Dadian
City Manager

cc: Mayor and City Council
County of Los Angeles Dept. of Public Works - Manuel del Real, Asst. Deputy Director