



Rio Alto Water District

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SSO Hearing: 2/8/06

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January 19, 2006

Ms. Selica Potter, Clerk of the Board
State Water Resources Control Board
Executive Office
1001 I Street, 24th Floor
Sacramento, CA 95814

Re: Comment Letter-01/19/06 Public Hearing for SSORP

Honorable Members of the Board:

The Rio Alto Water District would like the following comments placed in the record for the SSORP Public Hearing:

1. The "Sanitary Sewer Overflow Reduction Program" and resulting "Waste Discharge Requirements" are unnecessary and constitute an additional layer of bureaucracy. The State Water Resources Control Board and its Member Regional Boards already have full authority to prescribe and enforce sewer collection system O&M programs through the NPDES permitting process. The State Board, and in turn the Regional Boards, already have wide latitude within their governing mandates to protect the State's water resources.
2. Additional "Sanitary Sewer Overflow Reduction Programs" and resulting "Waste Discharge Requirements" are not necessary because the Rio Alto Water District's current NPDES permit and its accompanying Waste Discharge Requirements already incorporate a "Sanitary Sewer System Operation, Maintenance, Overflow Prevention and Overflow Response Plan (SSS Plan)" that must be developed and adopted within one year of permit issuance.
3. The adoption of an additional "Sanitary Sewer Overflow Reduction Program" and its "Waste Discharge Requirements" places unnecessary financial hardships on agencies that are already meeting NPDES permit and Waste Discharge Requirements.

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The State Board and its Regional Boards already possess the records of those Sanitary Sewer Systems that have a history of sewer overflow violations. The State and Regional Boards already have the knowledge and authority to address Sanitary Sewer Overflows statewide, on a case by case basis, by the adoption and enforcement of more stringent requirements for violators. Sanitary sewer overflows can be reduced without penalizing those agencies that meet permit requirements and are in control of their Sanitary Sewer Systems.

In the light of the comments above, The Rio Alto Water District respectfully requests that the State Water Resources Control Board set aside the "Sanitary Sewer Overflow Reduction Program" and resulting "Waste Discharge Requirements" that are the subject of your February 8, 2006 hearing.

Sincerely,



Roger Sherrill, General Manager
Rio Alto Water District

CC: Rio Alto Water District Board of Directors
California Regional Water Quality Control Board, Redding Office
Mr. Dave Bolland, ACWA

RS/bw