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**To:** <SSOcommentletters@waterboards.ca.gov>  
**Date:** 10/19/2009 11:36 AM  
**Subject:** Comment letter- "SSO Reduction Program Review Update"

Waste Discharge Requirements Unit  
State Water Resources Control Board  
1001 I Street, 15th Floor  
Sacramento, CA 95814

The City of Lakewood would like to thank the State Water Resources Control Board for the opportunity to provide the following comments based on the discussions held at the Public Meeting on Tuesday September 15, 2009, at the Orange County Sanitation District.

1) Implementation of the SSO WDR (SWRCB Order 2006-003) should be given additional time before major changes are made. Implementation efforts are still in the early stages. The full SSO General Order program has only been in existence for all agencies for two years, and some agencies are not even required to have their Sewer System Management Plans (SSMPs) completed until August 2010. Not only does the SWRCB need to allow more time for enrollees to develop and implement their SSMPs, but by making major changes in the SSO WDR's requirements now, it will create confusion and make it even more challenging for collection system agencies to improve their infrastructure by changing the requirements mid-stream. Therefore, changes to the existing WDR are not necessary at this time.

2) The SWRCB should be focusing its resources on obtaining compliance with the existing program, including ensuring that all entities that should be enrolled are and that reporting is occurring as required.

3) Private laterals spill reporting should continue to be voluntary, most local agencies do not own or have legal responsibility of private laterals.

3) The State Board should not mandate operator certification. The operation and maintenance of a wastewater collection system varies greatly depending on geographical location, design, flow, influence of groundwater infiltration, etc.

4) The State and regional Boards should allow additional two to three years for the effectiveness of each element of the SSMP to be evaluated. After the evaluation, changes deemed necessary could be recommended for implementation prior to the first recertification of the SSMP by enrollees Councils and/or Governing Boards now scheduled for fifth year from the original certification date.

If you have any questions, I may be reached at (562) 866-9771 ext. 2507 or by e-mail at kvivanti@lakewoodcity.org.

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