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October 23, 2009

RECEIVED

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General Manager

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ELAINE R. BOEHME
Secretary of the District

Via Electronic Mail

OCT 23 2009

DIVISION OF WATER QUALITY

Darrin Polhemus, Deputy Director
Division of Water Quality
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812

RE: Sanitary Sewer Overflow (SSO) Reduction Program Review and Update

Dear Mr. Polhemus:

CCCSD has read the recent letter of October 19, 2009, to you from the several associations, including Tri-TAC and BACWA, of which we are members, with regard to the review of the program established by Order 2006-003, the Waste Discharge Requirement for Sanitary Sewer Overflows. We support and concur with the points raised in that letter.

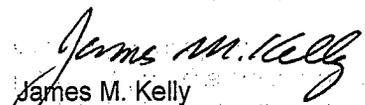
Our staff members have participated in the task forces that assisted the State Water Board in formulating the SSO WDR in 2006 and we have worked with a progression of user groups to help educate those in our industry who were unfamiliar with the monitoring and reporting processes. Two of our staff have taught classes in that effort.

The points in the letter from the Associations which resonated most strongly for us include the following:

- Compliance with existing requirements should be accomplished prior to initiation of new or changed components. From your data, there are nearly forty percent of agencies still not reporting and fifteen percent of agencies with incomplete questionnaires. These statistics serve to provide a jaundiced view of those agencies, such as CCCSD, who fully report and have since the beginning. The lack of reporting by the non-compliant agencies is unfair to the agencies that are reporting and the map of spills shown on the Water Board's website is misleading to any viewer of the website because of the agencies that are not yet included in the program or are not reporting appropriately.
- We applaud the concept of a data review workgroup that includes stakeholders and have expressed interest in participating.

We look forward to continuing to work with you to make this program increasingly efficient and effective.

Sincerely,


James M. Kelly
General Manager

JMK/slc