

**DISTRICT BOARD**

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October 21, 2009

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

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

Dear Mr. Polhemus:

The Las Gallinas Valley Sanitary District (District) appreciates the opportunity to comment on the above-referenced program, including possible revisions to the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (Order2006-003-DWQ).

Since adoption of Order 2006-003-DWQ, the District has placed a very high priority on measures to eliminate sanitary sewer overflows (SSOs) within its service area, and has seen a reduction in both the frequency and severity of SSOs. We believe this success is, in part, related to the District's implementation of a Sanitary Sewer Management Plan (SSMP) and other requirements of Order 2006-003-DWQ. Based on information provided by State Board staff during the September workshops, we understand that other sanitation agencies are also reporting a reduction in SSOs, but that a number of agencies are not yet in full compliance with the Order's reporting requirements. Rather than moving to amend an Order that is just starting to yield positive results for those agencies that are complying with its requirements, we urge the Board to instead focus the efforts of its staff on ensuring the full participation by all sanitation agencies, and thus achieve the Order's stated goals for enrollment and reporting by all agencies. A number of smaller agencies have only recently completed development of their SSMPs. The Order should be given sufficient "time to work" before new requirements are added or other revisions are made.

With regard to the issue of reporting spills from private laterals, an issue raised at the September workshops, the District strongly objects to any requirement that sanitation agencies be responsible for reporting SSOs that occur on private systems, including private laterals. Like small SSOs on the public system, private lateral SSOs typically do not impact water quality or public health. The current Order's spill reporting requirements already represent a significant regulatory mandate, to which sanitation agencies have been required to commit scarce resources. Any additional reporting requirements would serve no truly useful purpose and would further divert resources that could be better utilized for maintaining and upgrading facilities.

Sincerely,



Mark R. Williams

General Manager/Chief Operator

MRW

Cc: Board of Directors, LGVSD
Ray Goebel, EOA