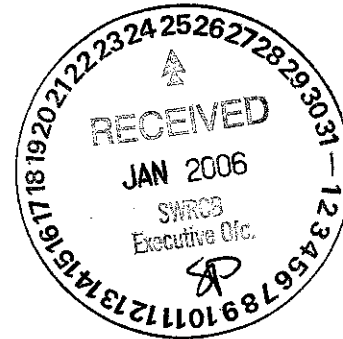


SSO Hearing: 2/8/06

January 25, 2006

Chairperson Doduc and Members of the Board
State Water Resources Control Board
Executive Office
1001 I Street, 24th Floor
Sacramento, CA 95814



Subject: Comment Letter – 1/19/06 Public Hearing for SSORP

Dear Chairperson Doduc and Members of the Board:

Thank you for the opportunity to submit comments on the Statewide General Waste Discharge Requirements for Wastewater Collection System Agencies (WDR) and the Monitoring and Reporting Program (MRP) as they are currently written. Though the City of Santa Clarita is supportive of the State Water Resources Control Board to implement a plan to reduce the frequency and volume of Sanitary Sewer Overflows (SSO) in general, the City has some concerns regarding the current plans up for consideration.

The proposed WDR is very prescriptive in nature. The development and implementation of a Sewer System Management Plan will require a sewer inspection regiment, cleaning program, rehabilitation measures, upgrade requirements, and better control of oil and grease. The costs of implementing this plan must be taken into consideration. As stated in the Fact Sheet provided by the State, the anticipated costs of implementing the WDR, as written, would be approximately \$870 million dollars resulting in an average cost per household of \$71.86. The City feels that this is a conservative figure and actual costs of additional equipment and sustaining long term programs in order to comply with the WDR will be substantially higher.

In addition, if a municipality or entity were to implement the WDR and MRP as written and follow the management, operation and maintenance requirements and experience an SSO, there is no differentiation between a negligent SSO and a non-negligent SSO. In today's litigious society, the City feels that language offering protection from third party lawsuits is warranted in these plans.

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The City of Santa Clarita urges the State Water Resources Control Board not to adopt the WDR and MRP as written. Language in these proposed documents must be included to offer protection from potentially unreasonable regulatory fines and third party lawsuits.

Thank you for your time and consideration of this matter. If you have any questions or need any additional information, please feel free to contact me at (661) 255-4337 or via e-mail at tlange@santa-clarita.com.

Sincerely,

Travis Lange
Environmental Services Manager

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cc: Ken Pulskamp, City Manager
Ken Striplin, Assistant City Manager
Robert Newman, Director of Public Works
Manuel Del Real, LA County Waterworks and Sewer Maintenance Division