

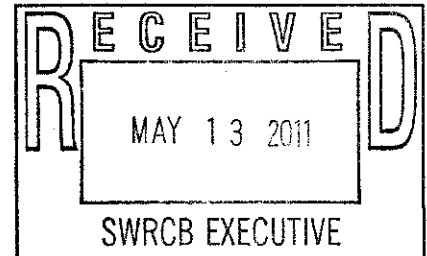
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VIA EMAIL

May 13, 2011

Jeanine Townsend,  
Clerk to the Board State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814



Dear Ms. Townsend:

**RE: Comment Letter – SSS WDRs Review & Update**

I am an independent consulting engineer and my primary focus is assisting sanitary sewer agencies in reducing the frequency and impact of sanitary sewer overflows (SSOs). In this role I have worked with over 100 sanitary sewer systems over the past 10 years. I was a voluntary participant in the development of the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, SWRCB Order No. 2006-0004-DWQ (SSO WDR). I have assisted in the preparation and implementation of over 30 Sewer System Management Plans (SSMP) and my SSMP template has been used as a starting point for many small agencies. My experience is that the process outlined in the SSO WDR is working at agencies that want to improve their performance.

The two major problems with the implementation of the SSO WDR are:

1. The CIWQS SSO database contains so many errors (primarily due to poor training and documentation and lack of an effective quality control effort).
  - This dataset is the key to measuring the program effectiveness.
  - This dataset could be a powerful tool for use by SWRCB staff in identifying poor performing agencies.
2. The SWRCB has not allocated the staff resources to conduct an effective oversight and enforcement program.
  - There are over 1,100 public sanitary sewer systems in California and only a handful have been inspected over the four years that the SSO GWDR has been in effect and their have been even fewer enforcement actions. Poor performing agencies have no reason to believe that they may receive and enforcement action.
  - Through my work I am aware of agencies that have submitted erroneous or misleading information with the intent of not calling attention to their performance.

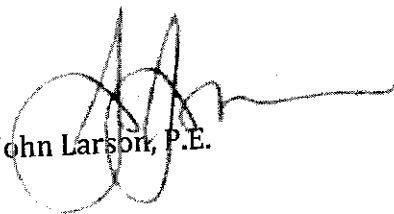
I do not support the proposed wholesale revisions to the SSO WDR. The program, which has yet to be fully or effectively implemented, is showing marginal

improvement. The best course of action at this time would be to provide the resources and the time to fully implement the SSO GWDR programs by addressing the major problems stated above. Once the SWRCB staff has a useful SSO database and has made progress with enforcement actions against poor performing agencies, the word will get out to the elected officials, managers, and maintenance staff at the remaining sanitary sewer system agencies that SSO prevention and reduction are important and failure to comply is both costly and damaging to the agencies standing with the public.

I support the proposed changes to the SSS WDR that clarify definitions and processes needed to support the SWRCB's activities with respect to the regulation of sanitary sewer systems.

I hope that these comments are helpful in acting in ways that will continue to reduce the frequency and impact of SSOs in California. Please feel free to contact me at (925.360.6600) if you have any questions.

Sincerely,

  
John Larson, P.E.