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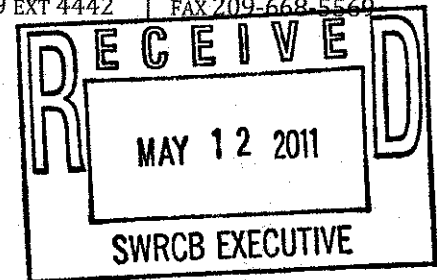
Public Comment
Sanitary Sewer System WDR
Deadline: 5/13/11 by 12 noon

MUNICIPAL SERVICES
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May 10, 2011

To: State Water Resources Control Board
From: Larry Gilley Utilities Manager, City of Turlock



Subject: Comment Letter - SSS WDRs Review & Update

Staff has reviewed the draft of proposed changes in the state wide monitoring and reporting program. On behalf of the City of Turlock Municipal Services Department, this letter is to inform you that we are very concerned with the changes that are being contemplated. In our opinion, the proposed changes to the original Sanitary Sewer Overflow Waste Discharge Requirements go far beyond what the program had originally intended to accomplish. At this point in time, we feel that the SSO WDR should remain as written so that the program can be fully implemented by all agencies. The program was intended to decrease SSO's and collect data as well as educate the agencies on the potential water quality and health issues associated with these overflows. The program has been a very valuable tool and will continue to be so in its current form. We feel that the implementation of a new program, with a different direction, is not only unnecessary but will prove costly for most agencies, including the City of Turlock. We believe that the staff and capital cost increases that will be a result of the proposed program changes is not a responsible course of action during these trying economic times.

In conclusion, The City of Turlock has spent valuable resources to implement the SSO program and would like to see the program continue in its original format. The proposed program changes will unnecessarily add costs which, at this time would not bode well with our ratepayers and City Council.

Some key points that should be debated:

Privately owned and maintained laterals should not be focused on.

Continue the original WDR as written most agencies are implementing best practices.

Include a flow or pipe range threshold.

A two tiered approach has been asked to be reviewed. The City of Turlock is opposed to this alternative.