

5/2/06 Item 7
SSORP
deadline: 4/24/06



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General Manager

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President

Elizabeth L. Cunrison
Vice President

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April 24, 2006

Song Her, Clerk to the Board
State Water Resources Control Board
Executive Office
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Sacramento, CA 95814
Fax: 916.341.5620



RE: COMMENT LETTER - 5/2/06 BOARD MEETING - SSORP

Dear State Water Resources Control Board:

I am writing on behalf of Western Municipal Water District to voice concern with proposed waste discharge requirements for sanitary sewer collection systems in California. Western collects and treats wastewater for the nation's largest Air Reserve Base as well as providing administrative oversight for a regional public treatment plant owned by a joint powers agency including the Santa Ana Watershed Project Authority, Jurupa Community Services District, Home Gardens Sanitation District and the city of Norco.

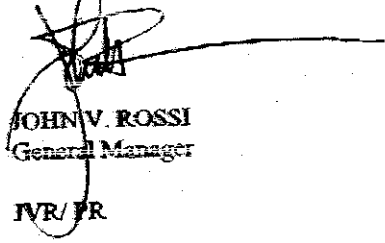
Western appreciates the opportunity to comment on this proposal which is the product of two years of significant effort on the part of your staff, regional boards, and the collection system stakeholders. We applaud the goal of creating consistent, statewide goals for sewage treatment with the aim of reducing sewage system overflows (SSO's).

Several serious concerns remain regarding the enormously complex requirements proposed in the WDRs for all publicly owned treatment works:

- 1) This new state regulatory permitting process would create enormously complex and detailed requirements for the operation, maintenance and management of collection systems on a scale never approached before. Western urges caution to avoid the unintended result of generating opportunistic lawsuits related to compliance with the complex matrix of prescriptive requirements, errors that may have little or nothing to do with actual SSO's. WDR compliance should create more, not less, protection from litigation.
- 2) The cost to implement the WDR statewide, according to State Board extrapolation of estimates for the Santa Ana Regional WDR, would be approximately \$6 per household per month, generating some \$870 million statewide. Western's Board of Directors is generally opposed to imposition of state fees and charges, particularly those with a vague nexus of benefit for our customers. Further, it is not clear who will oversee the reporting, management and enforcement of this program.
- 3) The new WDR costs and requirements appear to overlay much of the existing regulations under NPDES permits. Western is concerned that this may result in duplicative costs and conflicting or confusing regulatory requirements. Again, the new WDR should clarify and enhance environmental protections rather than confuse them.

Western appreciates the extensive work invested by the State Board and stakeholders to produce the latest draft of WDR policies. We remain optimistic that the State Board can, with input and cooperation from the regulated community, successfully resolve these complex technical, legal and fiscal issues.

Sincerely,



JOHN V. ROSSI
General Manager

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