



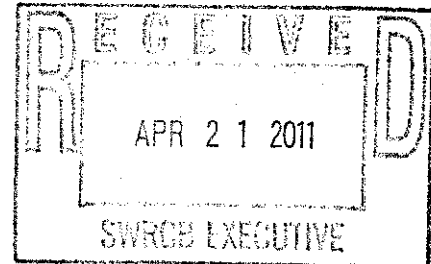
CITY OF MILPITAS

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April 19, 2011

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

Subject: Comment Letter – SSS WDR Review & Update



Dear Ms. Townsend,


The City of Milpitas appreciates this opportunity to comment on the proposed Sanitary Sewer System Waste Discharge Requirements (SSS WDR). We recognize the tremendous undertaking it is for your staff to draft the SSS WDR to be applicable to all agencies of the State, with each having a very unique topography, infrastructure and financial situation.

The City of Milpitas asks that the Board reconsider the costs and benefits of the prescriptive requirements added by this proposal. Our City's experience is that the current SSS WDR requirements are sufficient and that many of the new requirements add to the City's operations costs without improving performance. The ultimate goal, of Milpitas and the State, is to focus on reporting and reducing SSOs which affect water quality and/or public health. The City of Milpitas already has a relatively low SSO incident rate, averaging less than three per year over the last five years, or less than two SSOs per 100 miles of pipe per year. The City is effectively tracking SSO data, and using this data to monitor the effectiveness of its Capital Improvement Program (CIP) and maintenance program, and feels it is unnecessary for the State to dictate the City's CIP and/or how to maintain the sewer system. Lastly, it is unclear how the additional information to be generated will be used by the Water Board or that the efforts, and the additional costs required under the revised permit, will produce the increased corresponding environmental or public health benefits.

The City of Milpitas does feel certain aspects of the SSS WDR are beneficial, such as revisions to streamline the spill notification points of contact, modifying the applicability criteria to include a flow threshold and expanding coverage of the SSS WDR to private collection systems meeting the pipe mileage and proposed flow thresholds.

Please reconsider the proposed SSS WDR based on the ultimate goal – SSO reduction that benefits the public health and water quality. The City of Milpitas, as well as all other Enrollees, has the same goal, to maintain the sewer system to the best of their City's financial abilities and protect public health and the environment.

Sincerely,


Jose S. Esteves
Mayor