

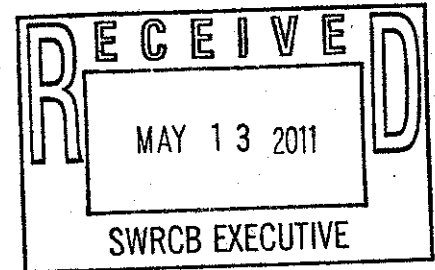


City of Santa Rosa

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

May 13, 2011

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



COMMENT LETTER: SSS WDRs REVIEW AND UPDATE

Dear Chairman Hoppin and Members of the Board:

City of Santa Rosa (City) staff appreciates the opportunity to comment on the proposed revisions to the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (SSS WDR). The City has been diligently implementing the existing general order (Order 2006-003-DWQ) and has expended significant resources in maintaining and improving its systems to reduce Sanitary Sewer Overflows (SSOs) and to provide accurate and timely reporting.

The City's sanitary sewer collection system consists of 588 miles of pipe and 17 lift stations. Since 2006, the City has averaged just 6.6 sanitary sewer overflows per year or 1.1 SSOs per 100 miles of pipe. Over the past decade, the City has allocated approximately \$10,000,000 per year to its capital improvement project program for the sanitary sewer collection system replacement.

City staff concurs with the comments submitted to you by the clean water associations, including the California Association of Sanitation Agencies (CASA) and the League of California Cities and incorporates them by reference. They have provided a thorough and thoughtful analysis of the proposed requirements and City staff agrees with their comments.

In addition, City staff is very concerned about the potential significant new costs associated with the Draft SSS WDR. Local governments are struggling to continue to provide essential services to their citizens, which will only be exacerbated by costly new requirements which equate to another unfunded mandate.

Further, any expectations that local governments can raise fees sufficient to pay for the proposed additional requirements are unrealistic. In order to cover the costs of implementation, cities, counties and districts would have to pass a Proposition 218 fee.

UTILITIES DEPARTMENT
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The passage of these fees is not an easy task and has become increasingly more difficult. In fact, a number of communities are seeing a backlash from ratepayers who are refusing the higher fees and proposing local ballot measures to roll back fees.

Thank you for your consideration of our comments. Should you have any further questions or comments, please contact Mr. Lynn M. Small, Deputy Director Environmental Services, at telephone number (707) 543-3350.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lynn M. Small for".

Miles A. Ferris
Director of Utilities