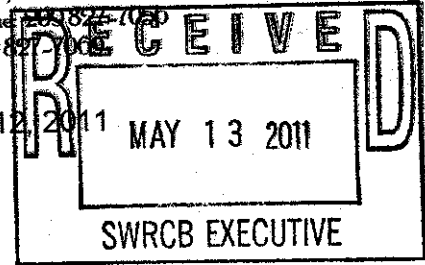




City of  
**Los Banos**  
At the Crossroads of California

City of Los Banos  
Public Works Department  
411 Madison Avenue  
Los Banos, CA 93635  
Telephone: 209-827-7000  
Fax: 209-827-7000



Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, Ca. 95814

May 12 2011

**Comment: Draft Waste Discharge Requirements for Sanitary Sewer Systems**

• **Requirements will place an unnecessary financial burden on POTWs.**

The proposed changes to the SSS WDR include numerous additional requirements for the POTWs. These additional requirements will place a financial burden beyond that of the original WDR. The additional requirements will place a financial burden beyond that of the original WDR. The additional requirements proposed in this draft will require equipment, personnel, and SSMP revision costs beyond many of the POTWs budget capabilities. It is our understanding that most POTWs are currently doing a good job of managing their systems and reducing SSOs. This added micro-management approach is costly and unnecessary. The additional possibility of NPDES permits will also add to the potential for legal costs and third party lawsuits.

• **Compliance will place a financial impact on ratepayers.**

The May 2, 2006 Fact Sheet for Order No. 2006-0003 stated an estimated \$71.86 annually per household, of O&M and Capital costs, in order to comply with the original order. Economically, POTWs are struggling to meet their financial obligations. Many ratepayers are also being financially challenged and should not be required to pay even higher rates to meet these additional requirements.

• **SSMPs should reflect the management practices that work best for the POTWs.**

The SSMP has been a positive tool for motivating and enabling agencies to do a better job of reducing SSOs. We feel that POTWs should be given the flexibility to manage their system in a manner that works best for them, rather than being mandated by all of the requirements ("shall") in this draft order.

• **Private lateral reporting should not reflect on the POTWs.**

Private lateral reporting, record keeping, and database information should be kept completely separate from the POTWs, whereas this would reflect deficiencies in the POTWs system.

• **Strongly agree with CVCWA views and comments.**

In addition, we have been working with CVCWA in the review of this WDR draft and strongly agree with their views and comments as stated in their comment letters to the board. Thank you for considering these factors as you make these critical decisions.

Sincerely,

Royal Lloyd, Wastewater Treatment Plant Supervisor  
cc: Mark Fachin, P.E., Public Works Director/City Engineer