



Costa Mesa Sanitary District

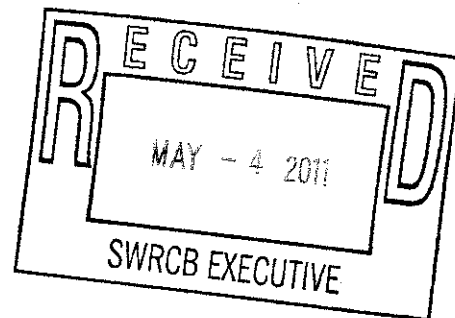
... an Independent Special District

April 20, 2011

Board of Directors

Robert Ooten
James Ferryman
Mike Scheafer
James Fitzpatrick
Arthur Perry

Ms. Jeanine Townsend
Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
Fax 916-341-5620



Staff

Scott C. Carroll
General Manager

Joan Revak
Office Manager
Clerk of the District

Robin B. Hamers
District Engineer
(949) 631-1731

Alan R. Burns
Legal Counsel

Marcus D. Davis
Treasurer

Re: **Comments Regarding Proposed SSS WDR**

Honorable Board Members:

The Costa Mesa Sanitary District (District) is located in the Costa Mesa/Newport Beach area of Southern California, has a population of 116,700 residents, and owns and operates a collection system with over 220 miles of sewer mains and 20 sewer pumping station.

The District has been in conformance with the regional WDR adopted in 2002 and the statewide WDR adopted in 2006 by judiciously following the requirements and provisions of the WDR and the District's SSMP. The District is committed to, and supports, comprehensive sewer system management including working with over 20 neighboring cities and sewer agencies in a regional effort to better the performance of mid and northern Orange County agencies.

The District hereby submits the following comments on the proposed SSS WDR that would replace the existing statewide SSO WDR (Order No. 2006-0003-DWQ):

1. The proposed order was published on March 24, 2011 and written comments must be submitted by April 29, 2011. This period should be lengthened to allow sufficient time to analyze the impact on sewer agencies. The District's fiscal year budget for 2011-2012 has already been prepared while analysis on the proposed SSS WDR is just beginning.

Phone

(949) 645-8400

Fax

(949) 650-2253

Address

628 W. 19th Street
Costa Mesa, CA
92627-2716



2. The proposed provisions of the SSS WDR have never been previously discussed at any of the state sponsored committees dedicated to improving the WDR and the MRP. There should be a guidance committee formed similar to 2005-2006 to provide dialogue and open discussion to truly understand the impact of the proposed provisions.
3. The requirements for reporting private lateral discharges should continue to be voluntary.
4. Although not included in the proposed WDR, the concept of having an agency change from coverage under the state order to an NPDES permit due to a spill reaching surface waters would take away the uniformity of agencies complying with the order. This two-tiered approach will discourage agencies from working in groups to share knowledge and programs.

In summation, the Costa Mesa Sanitary District urges the state to expand the comment period to allow in-depth analysis and comments on the proposed SSS WDR to insure the final document is clear and reasonable.

Sincerely,



Scott C. Carroll
General Manager

cc: Board of Directors
Staff