



City of Del Mar

1050 Camino Del Mar · Del Mar, California 92014-2698

Where the Turf meets the Surf

January 24, 2006

Selicia Potter, Acting Clerk to the Board
State Water Resources Control Board
Executive Office
1001 I Street, 24th Floor
Sacramento, CA 95814
Via: FAX: (916) 341-5620



SSO Hearing: 2/8/06

RE: Comments for Public Hearing on Statewide General Waste Discharge Requirements for Wastewater Collection System Agencies.

Dear Ms. Potter:

On behalf of the City of Del Mar, I am writing to comment on draft Order 2006-___ Statewide General Waste Discharge Requirements for Wastewater Collection System Agencies. Del Mar is a very small coastal City and we operate our own sewer collection system. We are proactive, maintain a positive campaign to prevent spills, provide for long term capital maintenance needs through an ongoing five year capital improvement project budget supported by some of the highest sewer rates in San Diego County. The City has always worked to minimize to the maximum extent practicable sanitary sewer overflows. It has been three years since any spill (public or private) in Del Mar has caused the City to post the beach to protect public health.

We find the new Order is a good step to bring other cities collection systems up to our current standards. We also look forward to continual improvements in our system and support most outlined steps contained in the draft Order 2006-___. However, there are three specific areas of concern.

1. Proposition 1A requires the State to match the resources required to comply with any new state mandate. Your fact sheet speaks of a projected annual cost of \$28.74 per person, which translates for Del Mar as \$126,456, based upon a population of approximately 4,400. This would require a minimum 5% average increase in customer's rates, if we were able to adjust those rates when the order is finalized. Of course, we must conduct a rate hearing to modify the utility rates. Currently, our next rate hearing is scheduled for fiscal year 2009. This Order should include the funding to support this implementation and ongoing cost to supply the State with the documentation of our ongoing efforts to protect our community, lagoons and beaches from sewage spillage.
2. The City seeks to support an Order which would defend us from all third party suits and thus, we are quite concerned that this Order may open our City to litigation when a spill occurs beyond our reasonable control. As the Board is



aware, people place all kinds of foreign matter into our sewers and these products are causing us an ever increasing concern. For example: retail stores sell flushable toilet brushes, baby wipes, and other cleaning cloths which clog our sewer collection systems. Private laterals are improperly cleaned by a property owner which sends clogs of debris into our public sewer mains without notice. Restaurant workers violate the City's ordinances and dispose of food wastes and grease into the system while the managers and owners are unaware of these activities. These private activities are beyond the City's control as the sewer collection system operator. The State should first prohibit sales of these slow to deteriorate products and provide defense from third party suits when these and other products cause a stoppage.

3. A small City like Del Mar must contract for engineering services. While many tasks are done via our contract engineers, such as capital improvement plans and construction management, most of the day to day operation and the formulation of a sanitary Sewer Maintenance Plan can and should be allowed to be accomplished by our City's Public Works staff. Requiring all maintenance to be under an engineering certification drastically increases the cost imposed by this Order. Furthermore, a system like ours, built out for many years and without a sewer spill due to capacity, should not be required to undergo the cost of an engineering study to prove the systems hydraulic capacity. This further increases the cost to implement this Order. The City requests that this requirement be modified and only pertain to engineering tasks where the City has demonstrated need for engineering analysis or does not have in-house expertise.

Thank you for the opportunity to comment on this Order and for requesting feedback from one of your smaller municipal systems. As always, we will do all we must to protect our coastal waters from sewage spills. We, too, do not want our families and citizens exposed to any raw sewage, if at all possible.

Sincerely,



Crystal Crawford
Mayor

CC; City Council
City Manager
City Engineer
Public Works Director
San Diego Metro Commission Technical Advisory Committee

CITY OF DEL MAR 1050 CAMINO DEL MAR, DEL MAR, CA 92014 /858 755-9313



FAX

Date: 1-24-2006

Number of pages including cover sheet: 3

To: Selicia Patter, Acting
 Company: Clerk of the Board
State Water Resources
Control Board

RE: _____

Phone: _____

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CC: _____

From: _____
Mercedes Martin
Del Mar City Clerk

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Fax phone: 858 755-2794

REMARKS: Urgent For Your Review Reply ASAP Please Confirm

Important / Timely