



CITY OF CORONADO

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TOM SMISEK
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January 25, 2006

SSO Hearing: 2/8/06

Tam Doduc, Chair, and Members
State Water Resources Control Board
Executive Office
1001 I Street, 24th Floor
Sacramento, California 95814



Attention: Selica Potter, Clerk to the Board

Subject: Comments on the Proposed Statewide Waste Discharge Requirements for Sewer Collection Systems

Dear Chairman Doduc and Board Members:

On behalf of the City of Coronado, I would like to first thank you and your fellow Board members for your commitment and dedication to furthering the preservation and enhancement of our State's water resources. Coronado, being almost entirely surrounded by water (San Diego Bay, Pacific Ocean), shares your commitment. We are dedicated to protecting our water and shoreline resources.

Coronado, along with our fellow 17 cities, the County, and several water/sewer districts in the San Diego Region, is highly committed to minimizing sanitary sewer spills. The San Diego Regional Water Quality Control Board has played a significant part in this matter. Coronado supports the general direction of the proposed Statewide General Waste Discharge Requirements (WDR); however, we would request that the Board make the following changes to the proposed WDR:

- Reinstatement of the "affirmative defense" contained in the earlier drafts. Rare and exceptional sanitary sewer overflows that are clearly beyond the reasonable control of the collection system owner should be protected from enforcement proceedings. Within the proposed WDR it indicates that "Many SSOs are preventable"; we would go as far as to say most SSOs are preventable. Our request for the "affirmative defense" is solely focused on the rare, non-preventable SSO.



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- **Sewer System Management Plan:** We would request that the State Water Board provide a template for the proposed plan, along with a sample plan (beyond what is listed in the WDR) or provide funding for the development of the plan to the enrollee. The template would reduce development costs and standardize information (this would help not only your staff but also "enrollees"), while ensuring the content format. This comment is not intended to restrict an "enrollee" from using their own format should they so desire. We are further concerned that, without such a document template and specific standards, the Regional Water Boards may further expand components of the plan, documentation, monitoring and reporting, and increase the frequency of the internal audits. A standardized template and sample plan would allow many enrollees the ability to produce the plan using internal staff, thus potentially saving ratepayers' money.
- **SSMP Implementation Time Schedule:** We believe that the proposed time schedule would be adequate if a plan template and a sample plan were provided to each enrollee upon WDR adoption. Otherwise, we believe that a minimum of four additional months should be added to the Sewer System Management Plan Time Schedule for completion of Section C.13.(i) through (viii).

Again, I want to emphasize that we support the SWRCB's efforts and its dedication on behalf of all our customers (residents and business owners). We hope you take our suggested amendments into account when modifying the proposed WDR.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read "Thomas Smisek".

Thomas Smisek
Mayor