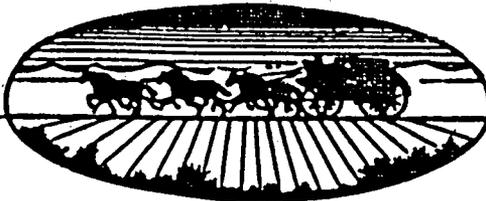


City of
Arroyo Grande

PUBLIC WORKS



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July 15, 2004

Roger W. Briggs
Executive Officer
California Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401



SUBJECT: Draft Order No. R3-2004-0062

Dear Mr. Briggs:

Thank you for the opportunity to review and comment on draft Order No. R3-2004-0062.

The order proposes to require preparation of individual Wastewater Collection System Management Plans from the Cities of Arroyo Grande and Grover Beach and Oceano Community Services District thereby separating them from the South San Luis Obispo County Sanitation District (SSLOCSD). However the collection systems are not completely separate and are operated in conjunction with one another and SSLOCSD. Our collection systems are all connected at numerous points and we work together on many levels to operate and maintain them.

The City of Arroyo Grande has an Infiltration/Inflow and Spill Prevention Program in place. This program in conjunction with the City's Wastewater System Master Plan adopted on November 13, 2001, have provided comprehensive guidance to operate, maintain, and improve our wastewater collection system. The system in place has been successfully operated for forty (40) years with very few problems.

RWQCB already deals with each agency separately when addressing compliance issues. Historically there have been few overflows of the collection system by these agencies, all of which have been contained and cleaned up without discharge to surface water. The goal of order R3-2004-062 is to minimize overflow, which has already been attained and any further regulation may in fact have the opposite effect by redirecting resources away from the operation and maintenance of the collection system.

Item No. 22 Attachment No. 2
September 10, 2004 Meeting
Local WW Collection Agencies

Mr. Roger W. Briggs
July 15, 2004
Page 2

The order as proposed has been discussed with the other agencies and it is agreed that it would be productive to meet with RWQCB staff to discuss the uniqueness of the South County collection system and how to address future maintenance and operations of the collection system.

Please contact me at 473-5440 to schedule a date and time to meet on this issue at your earliest convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Spagnolo". The signature is written in a cursive, flowing style.

Don Spagnolo, P.E.
Director of Public Works/City Engineer

C: Steve Adams, City Manager
John Wallace, SSLOCSD
Mitch Cooney, OCSD
Jake Raper, City of Grover Beach