

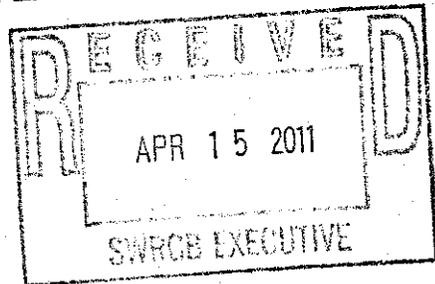


CITY OF EL PASO DE ROBLES
"The Pass of the Oaks"

April 15, 2011

BY ELECTRONIC MAIL

Jeanine Townsend
Clerk to State Water Resources Control Board
commentletters@waterboards.ca.gov



Dear Ms. Townsend:

Comments on Sanitary Sewer System Waste Discharge Requirements Review and Update

The City of Paso Robles is implementing its Sewer System Management Plan per the existing Sanitary Sewer System Waste Discharge Requirements (WDRs). This has reduced the frequency and severity of sewage spills. In 2010, the City had only one small sewage spill that did not reach surface waters. The existing WDRs are effective and don't require major changes.

Paso Robles agrees with your staff that State Board should wait until U.S. EPA completes their national sewer system requirements before considering switching to a two-tiered NPDES/WDR permitting scheme. Switching to a two-tiered permitting scheme now would create an administrative nightmare for State Board and local agency staff at a time when staff resources are very thin. Such a change will divert limited resources and reduce the efficacy of your sewage spill reduction program.

If State Board chooses to regulate collection systems with an NPDES permit, then an existing NPDES permit should suffice. The City of Paso Robles NPDES permit already prohibits sewage spills to any surface waters. Paso Robles does not want to enroll in a separate NPDES permit for its collections system and pay two separate NPDES permit fees.

Thank you for this opportunity to comment. If you have any questions, please call me at (805) 227-7200 ext. 7716.

Sincerely,

Matt Thompson
Wastewater Division Manager