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October 17, 2006

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Mr. David LaCaro

Central Coast Regional Water Quality Control Board

895 Aerovista Place, Suite 101

San Luis Obispo, CA 93401

Dear Mr. LaCaro,

These comments on the Revised Waste Discharge Requirements (WDR) for the Montecito Sanitary District (MSD) Wastewater Treatment Facility, are submitted on behalf of Heal the Ocean, a non-profit corporation active in improving water quality in the Pacific Ocean and local watersheds of Santa Barbara County.

The information contained in WDRs is an important tool utilized by the public. These documents create a central place where information on all the facilities in the region can be obtained. As such, it is critical that there is consistency between documents and that the different facilities present the same type of information in relevant, specific sections. In this regard, we have two requests for further revision of the MSD WDR.

Inclusion of flow statistics

We have reviewed almost all WDRs for wastewater treatment plants that discharge into the Pacific Ocean, and the majority of them include within their facility descriptions data on Annual Average Dry Weather Flow, the Peak Seasonal Dry Weather Flow, and the Maximum Wet Weather Flow. The MSD revised WDR needs to include this information.

Ocean outfall information

The facility description (WDR Pg. 3) is missing a detailed account of the ocean outfall distance from shore and depth of water at the discharge point. Other WDRs have this information in the facility description and in the Fact Sheet, whereas the MSD WDR has this information only in Appendix F - Fact Sheet. We ask that this information be inserted into the facility description (WDR Pg. 3) as well as the Appendix, to eliminate the problem of searching through the entire document to find it.

Because it is important that all WDRs be as consistent as possible, we thank the Regional Board staff for its consideration of these comments.

Priya Verma, policy analyst HEAL THE OCEAN

SENT BY E-MAIL & U.S. POST

cc. Ms. Diane M. Gabriel, mgr. Montecito Sanitary District

STATE OF CALIFORNIA CENTRAL COAST WATER B

Item No. 10 Attachment No. 3 Dec. 1, 2006 Meeting Montecito Sanitary District

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