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To: <commentletters@waterboards.ca.gov>
CC: Nathan Giacinto <nathang@cityofsolvang.com>
Date: 4/6/2011 5:22 PM
Subject: Draft - Statewide General Waste Discharge Requirements for Sanitar Sewer Systems

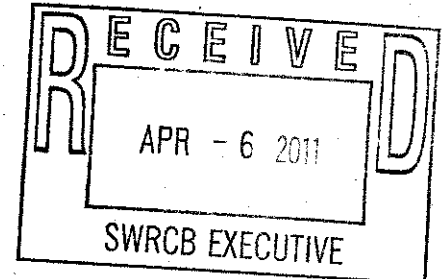
Jeanine Townsend, Clerk to the Board

State Water Resources Control Board

1001 I Street, 24th Floor

Sacramento, CA 95814

Comments on subject document.



In general the content and intent of the requirements are very good. However, small agencies such as the City of Solvang have limited staff, very limited resources, and produce relatively low volumes of wastewater flow. The cost of compliance with the requirements is quite high. We request that the compliance requirements such as staff assessments, monitoring, audits, communication program, etc. be tiered such that the full requirements apply to larger agencies and the requirements are simplified for smaller agencies with low wastewater volumes. This would allow us to better manage the high cost of compliance, and seems reasonable based on the lower risk associated with low volume agencies.

Thank you for your thoughtful consideration.

Sincerely,

Matt van der Linden, P.E.

Public Works Director/City Engineer

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