

1 VANESSA BLEVINS: Hi. This is
2 Vanessa Blevins, B-L-E-V-I-N-S. My first comment
3 is I don't feel like this hearing represents at
4 least the intent of the public notice requirement
5 in the promulgation of regulations. Regardless of
6 what meetings on other subjects may have happened
7 four or five years ago, I think that a regulation
8 update of this magnitude requires more meetings in
9 order to identify all of the unintended
10 ramifications of these regs and the trickle-down
11 effect of these regs, and I don't think it can be
12 done in a two-hour public telephone call.

13 The second comment is, there are
14 many sections of the regs that are very, very open
15 to -- I guess "engineer judgment" would be a word.
16 I think that the clear requirements for submittals
17 and approvals should be in regs, and that all of
18 the sections that indicate "Other information as we
19 decide we want it" -- I don't think that power
20 should be vested in the staff. I think that should
21 be vested somewhere else, either in an oversight
22 committee or in a higher office like the
23 commissioner's office.

24 Those "other information as
25 needed" components have been used extensively, and

1 it seems like the use of those special
2 circumstances has increased substantially in the
3 last few years. And I think that is in direct
4 conflict with the requirement that regulations
5 undergo a public notice process.

6 And I think that, given the fact
7 that there's only two licensed engineers doing
8 wastewater plan reviews and four staff total, that
9 the implementation of these regs over four people
10 and two engineers should be carefully considered.
11 It seems like there's a lot of stuff here for four
12 people to do and do well in a timely manner.

13 And that's all of my comments.