



PIMA COUNTY
WASTEWATER MANAGEMENT DEPARTMENT
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Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th Street N.W.
New Executive Office Building, Room 9013
Washington, D.C. 20503

RE: Proposed Bulletin for Good Guidance Practices

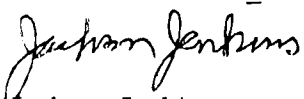
The Office of Management and Budget (OMB) is proposing policies and procedures for agencies to develop, issue and use guidance documents. This Bulletin is intended to increase the quality and transparency of agency guidance practices and the guidance documents produced through them.

Pima County Wastewater Management Department [PCWMD] is a stakeholder under numerous regulatory programs administered by the EPA or their delegated state authorities. We have found in the past that it is sometimes difficult to obtain guidance in written form. A permittee trying to evaluate the conditions in a permit has a right to review the basis for those terms. The regulations implementing the NPDES permits require a Statement of Basis to accompany those draft permits. If the underlying draft guidance documents are unavailable however, there can be a misunderstanding of the rationale for the permit.

We believe OMB's proposal would effectively improve the quality of the decision making based on agency guidance. The public access and feedback provisions, particularly internet access, will enable our agency to provide input to improve the appropriate application of guidance to our unique ecosystems of the arid west. The absence of procedural review mechanisms have resulted in inappropriate standards being applied to our unique circumstances.

PCWMD supports the proposed initiative on Good Guidance Practices. We look forward to the opportunity to participate by submitting comments on future guidance documents adopted by federal regulatory agencies.

Sincerely,



Jackson Jenkins
Deputy Director

- C. Michael Gritzuk, P.E., Director
- Jeff Prevatt, Technical Services Superintendent
- Byron McMillan, Permit & Regulatory Compliance Officer
- Harlan Agnew, Esq., Deputy County Attorney