



November 5, 2009

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Gerard J. Thibeault, Executive Officer  
California Regional Water Quality Control Board, Santa Ana Region  
3737 Main Street, Suite 500  
Riverside, CA 92501-3348

22795 Barton Road  
Grand Terrace  
California  
92313-5295

RE: Draft San Bernardino County MS4 Permit: Order 2009-036

Dear Mr. Thibeault:

I have recently received information on the MS4 NPDES Permit for San Bernardino County within the Santa Ana River Watershed (Permit). I am strongly opposed to some of the new requirements including:

- Numeric Effluent Limits (NEL) for TMDL compliance
- Low Impact Development (LID)
- Land use policies and development code
- Public and private road projects
- Residential program
- Requiring changes to Ordinances, General Plan, and Municipal Code

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Maryetta Ferré  
Mayor

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Council Members  
Bea Cortes  
Jim T. Miller  
Walt Stanckiewicz

Thomas J. Schwab  
City Manager

As a small, built-out community with limited land use, any changes to rules and regulations will take a huge toll on development within our City. The limited space available already presents enough problems without adding regulations to it. Grand Terrace supports protecting water quality, however, we feel opposed to implementing these requirements as they are written. The cost of enforcement of NEL and changes to City Ordinances, Municipal Code, General Plan or Zoning/Development Code, as mandated by this Permit, would be in the hundreds of millions if not billions of dollars for County wide infrastructure along with additional staff to maintain and enforce these requirements.

The City also supports the comment letter being prepared by the Principal Permittee. We do not reject the overall goal of improved water quality; however, the fiscal challenges presented with this permit are unfeasible. The cost/benefit must be considered as many agencies already have extreme pressure on their budgets and the available staff is limited.

Respectfully,

Maryetta Ferré  
Mayor

cc: Matt Yeager, San Bernardino County Flood Control District