

# County Of Santa Barbara

Public Comment  
Draft Phase II Small MS4 General Permit  
Deadline: 7/23/12 by 12 noon

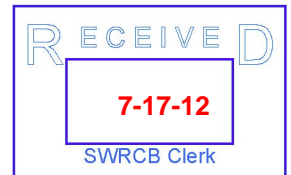
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## Executive Office

July 17, 2012



Jeanine Townsend, Clerk of the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814  
E-mail: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Subject: Comment Letter – 2<sup>nd</sup> Draft Phase II Small MS4 General Permit

Dear Ms. Townsend and Members of the Board:

Thank you for the opportunity to comment on the 2<sup>nd</sup> Draft Phase II Small MS4 General Permit (Draft General Permit). Santa Barbara County understands the importance of the Phase II regulations for improving storm water quality and appreciates the effort of the State Water Board staff in developing a Draft General Permit for statewide application. We would like to thank the State Water Board for extending the time line for adoption of the Draft General Permit in order to complete a public review process that was both meaningful and productive. The extra time devoted to meeting with stakeholders and making major and necessary revisions has resulted in a 2<sup>nd</sup> Draft General Permit that is more practical and reasonable.

The County participated in the California Stormwater Quality Association (CASQA) Phase II subcommittee review of the Draft General Permit and fully supports the detailed comments and recommendations contained in their July 2012 letter. Collectively, CASQA members possess a wealth of practical and professional storm water management experience and their active participation throughout the public review process resulted in beneficial revisions to the 2<sup>nd</sup> Draft General Permit. While the revisions have resulted in a more practical permit, several significant challenges remain as outlined in CASQA's July 2012 letter. Incorporation of CASQA's comments and recommendations will ensure that the Draft General Permit can be successfully implemented by Phase II communities throughout the State. We strongly encourage you to incorporate their suggestions into the final version of the General Permit.

The County of Santa Barbara values clean water and has been successful in implementing a model Storm Water Management Program that is efficacious and cost-effective. However, the County will need to significantly expand our current storm water management budget in order to implement the new requirements of the Draft General Permit concurrent with upcoming Total Maximum Daily Load (TMDL) requirements. These new requirements will result in additional ongoing operational costs that cannot be funded through existing state and federal grant programs. The County encourages the State Water Board to adopt all the recommendations made in the July 2012 CASQA letter designed to reduce the liability of

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the current receiving water limitation language, to phase in implementation of new requirements, and to focus on measures with the greatest water quality benefit. These suggested revisions will allow the County to better focus our limited resources on achieving clear and tangible outcomes, better protecting our watersheds, and reducing pollution of creeks, groundwater, and the ocean.

The County appreciates the opportunity to provide comment and looks forward to working together on implementing a successful, science-based, and cost-effective Storm Water Management Program. If you have any questions, please don't hesitate to contact my office.

Sincerely,



Chandra L. Wallar  
County Executive Officer

Cc: Renee Bahl, SB County Assistant CEO  
Scott McGolpin, Director, SB County Public Works  
Glenn Russell, Director, SB County Planning & Development  
Joy Hufschmid, SB County Project Clean Water Manager