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San Luis Obispo **COASTKEEPER**[®]

October 2, 2006

Central Coast Regional Water Quality Control Board
ATTN: Ryan Lodge
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

Subject: County of San Luis Obispo Stormwater Management Program (3rd Revision)

Dear Mr. Lodge,

Thank you for the opportunity to review and comment on the proposed Storm Water Management Plan for the County of San Luis Obispo.

The San Luis Obispo **COASTKEEPER**[®], a program of Environment in the Public Interest, is organized for the purpose of ensuring that the public has a voice with agencies and officials responsible for enforcing water quality, watershed and coastal planning regulations on the California Central Coast. As such, the SLO **COASTKEEPER**[®] and our 1200 central coast supporters are concerned that the proposed SWMP:

- Is impermissibly vague for many components.
- Does not clearly identify financial resources available to implement the proposed program.
- Fails to incorporate specific measures that will protect water quality in San Luis Obispo County.

Specific comments follow, however I am writing to request that RWQCB Staff agendaize a public hearing for consideration of the County's proposal.



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PUBLIC EDUCATION AND OUTREACH

The Public Education and Outreach measures fail to meet the federally mandated maximum extent practicable (MEP) standard. For instance: While we agree that the "Sammy the Steelhead" campaign is a high quality effort that is broadcast widely, the SWMP does not clearly demonstrate that the stated goal (changed behavior) will either be achieved or even measured.

PUBLIC PARTICIPATION AND INVOLNEMENT

It appears that the County's public participation has confused goals and purposes of the public education and outreach MCM. Program development and implementation are what distinguishes this MCM from the Public Education and Outreach component.

Past creek and beach clean-up days have been successful to a great degree. However, progress and effectiveness should be measures of behavioral changes and actual improvement in water quality as opposed to the number of people who either participated, showed up at a meeting, or filled bags with trash.

ILLCIT DISCHARGE DETECTION AND ELLIMINATION

This measure fails to meet the federally mandated maximum extent practicable (MEP) standard. The document is vague and unclear regarding how enforcement will be carried out given current staffing levels. The absence of commitment to funding this element clearly does not provide enough information to determine if illicit discharges will actually be detected or, in fact eliminated.

One example of the weakness of the County Proposal is the on-going septic system discharge problem in Los Osos. The County is the sole authority to implement a Septic System Management Program in unincorporated areas. In Los Osos, septic systems in areas where discharges regularly contaminate stormwater runoff are mapped and well known. Yet no enforcement has been exercised to date. The County proposal contains no clear, measurable action that would address this problem area.

CONSTRUCTION SITE STORM WATER RUNOFF CONTROL

The Construction Site Storm Water Runoff Control Program is impermissibly vague, fails to include detailed requirements and commitments for implementation. What the County has offered in reality is a plan to create requirements in the future (maybe, if a new storm water ordinance has been drafted by year 3).



Resent Region 3 experience with County grading ordinance and enforcement at the Kalegian and Pierson properties is a compelling demonstration of the risk to County waterways should this element remain weak and underfunded.

POST-CONSTRUCTION STORM WATER MANAGEMENT

We applaud the inclusion of requirements for "Low Impact Development". Many of the LID techniques incorporate greater use of permeable surfaces and have become accepted as Best Management Practice.

However, the lack of a budgetary commitment to this element may render this measure impotent and ultimately fail to meet the federally mandated maximum extent practicable (MEP) standard.

POLLUTION PREVENTION / GOOD HOUSEKEEPING

The Pollution Prevention/Good Housekeeping program is vague and fails to meet the federally mandated maximum extent practicable (MEP) standard. The following action item should be among those considered to improve this program:

- Revise the program to provide for street sweeping operations to commence immediately.
- Revise storm water management program to provide for development of procedures for used motor oil disposal within one year.
- Explicitly provide for dechlorination of swimming pools prior to disposal.

In conclusion, the San Luis Obispo County SWMP cannot be approved in its current form and must be modified to meet federally mandated MEP standards.

Respectfully Submitted,

Gordon Hensley,
San Luis Obispo **COASTKEEPER** °



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