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February 26, 2007

Chair Jeffrey Young and Members of the Board
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

Re: San Luis Obispo Storm Water Management Program

Dear Chairman Young and Board members,

Our comments on the proposed resolution adopting the County of San Luis Obispo Storm Water Management Program reiterate our comments of 10/5/06 to Ryan Lodge, as the problems noted then persist, particularly the lack of specific measures and structural BMP's throughout the draft.

These comments are submitted on behalf of the members of the Santa Lucia Chapter of the Sierra Club. The Sierra Club is dedicated to the practice and promotion of the responsible use of the earth's ecosystems and resources and to public education to protect and restore the quality of the natural and human environment.

Our comments on the SWMP are confined to development and post-construction stormwater management, a particularly critical area of the program due to San Luis Obispo's high current and projected rate of growth. As noted in the SWMP, "The BMPs for this minimum control measure provide one of the best opportunities to reduce the generation of nonpoint source pollution from urban runoff through construction planning and design prior to development."

For this reason, we are concerned by the pervasive lack, in this section and throughout the document, of specific measures that the County shall adopt to reduce stormwater pollution.

At 4.5 Best Management Practices and Measurable Goals for Post-Construction Stormwater Management for New Development and Redevelopment, listed BMP #1 refers to the adoption of ordinance revisions and notes that these must include the requirements in Attachment 4 of the MS4 General Permit. These requirements should be specified.

At Minimum Control Measure #5: Post-Construction Stormwater Management In New Development And Redevelopment BMP #PC5 states that the Los Angeles County Standard Urban Stormwater Mitigation Plan (SUSMP) "can be used as a model" to develop and implement a Low Impact Development (LID) Design Standards Manual. We would like to see this changed to an assurance that the L.A. County SUSMPs *will*, not "can," be used as the model for San Luis Obispo LID standards, as no other specific design standards are cited. The L.A. SUSMP model, particularly as pertains to single-family hillside residences, residential structures of 10+ units, restaurants, gas stations, and many parking lots and redevelopment projects, should be imported directly into the SLOSWMP.

Structural BMP's are notable largely by their absence from the SWMP. Aside from noting their presence in the MEP standard the EPA's requirement for their inclusion, specific Non-Structural and Structural or Treatment Control BMPs appear to be left up to individual project plans. The program must state, not merely indicate, the post-construction Non-Structural and Structural BMPs it will mandate in order to fulfill the purpose of the program.

Thank you for your attention and the opportunity to comment on the program.



Andrew Christie
Chapter Director