



FRESNO METROPOLITAN FLOOD CONTROL DISTRICT

File 510.1812

April 15, 2013

Mr. Dale Harvey
Regional Water Quality Control Board
Central Valley Region
1685 "E" Street
Fresno, CA 93706-2020

Dear Mr. Harvey,

**NPDES Permit No. CA0083500,
Tentative Waste Discharge Requirements,
Storm Water Discharges from Municipal Separate Storm Sewer System (MS4)**

Thank you for the opportunity to comment on the Tentative Waste Discharge Requirements for the Fresno/Clovis metropolitan MS4 storm water permit.

The Fresno Metropolitan Flood Control District (District) is the lead agency among five Co-Permittees under an area-wide NPDES permit for the Fresno-Clovis metropolitan area serving a population of approximately 700,000 people. Co-Permittees include the District, City of Fresno, City of Clovis, County of Fresno, and California State University, Fresno. Through implementation of a Storm Drainage and Flood Control Master Plan, the District has built and manages a regional stormwater treatment system providing service to a 164 square mile area.

The tentative order will require the Permittees to submit a separate Long Term Effectiveness Assessment (LTEA) and Reporting Program Plan within 6 months of the adoption of the Permit. Considering the LTEA is an integral component in the revision of the Permittees' Storm Water Quality Management Plan, also due within 6 months of the adoption of the Permit, the Permittees request that the LTEA be incorporated within the revised SWQMP and not as a separate report.

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We thank you again for the opportunity to comment on the tentative order. If you have any questions regarding our comments, please feel free to contact Daniel Rourke of the Fresno Metropolitan Flood Control District at (559) 456-3292.

Sincerely,


Bob Van Wyk, General
Manager
Fresno Metropolitan Flood
Control District


Lisa Kao, Associate Director,
Office of EHS
California State University,
Fresno


Lisa Koehn, Assistant Public
Utilities Director
City of Clovis


Robert Palacios, Manager
Maintenance and Operations
Division,
County of Fresno