



SAN BERNARDINO COUNTY STORMWATER PROGRAM

A Consortium of Local Agencies

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October 26, 2010

File: 10(NPD)-2.01

Member Agencies

City of Big Bear Lake

City of Chino

City of Chino Hills

City of Colton

City of Fontana

City of Grand Terrace

City of Highland

City of Loma Linda

City of Montclair

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City of San Bernardino

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County of San Bernardino

*San Bernardino County
Flood Control District*

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The recently renewed Municipal Stormwater NPDES Permit for the Santa Ana Watershed in Orange County (OC Permit) was adopted by the Santa Ana Regional Water Quality Control Board (Regional Board) on May 22, 2009. One of the substantial requirements of the OC Permit is the development of a guidance document to assist in the preparation of conceptual or preliminary WQMPs within 12 months (Section XII.2). There are numerous related requirements in Section XII, including a requirement to review and revise the WQMP to incorporate LID Principles within 12 months of OC Permit adoption (XII.C). The County of Orange submitted these two documents on May 24, 2010, following an intensive stakeholder development process.

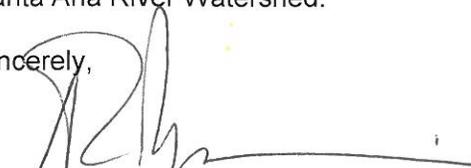
We were notified that the Regional Board intends to reopen the OC Permit to consider extending the deadline for submittal of the revised WQMP, the revised Watershed Master Plans and related documents (which includes the guidance document from XII.2). The Regional Board proposes a six-month extension of these submittal dates, and will hold the Public Hearing to consider this action on October 29, 2010.

We wish to express our strong support for this extension of the OC Permit deadlines. In our view, the 12-month deadlines were unreasonable, given the potential magnitude of the impact of the WQMP and related documents, and the level of stakeholder involvement in their process.

If granted, the extension would also allow for limited collaboration between the OC Program and the San Bernardino County Stormwater Program regarding the WQMP. In particular, we will seek to develop WQMP guidance that has a consistent methodology to support site design and BMP decisions. You may be aware that San Bernardino County is developing a Watershed Action Plan (WAP) using a GIS-based map approach to watershed management. We believe that a few months of discussions with the Orange County WQMP-related advisory groups would provide an opportunity to develop a consistent set of GIS-based tools, such as a preliminary WQMP Template.

We have already been in discussions with Orange County regarding the development of the San Bernardino County WAP, and there are no apparent technical barriers to full collaboration over a longer term. Such collaboration would improve consistency of WQMP implementation with the Santa Ana River Watershed.

Sincerely,


GRANVILLE M. BOWMAN, P.E., P.L.S.,
Flood Control Engineer