CARMEL J ANGELO Chief Executive Officer Clerk of the Board



Public Comment Phase II Small MS4 General Permit Deadline: 9/8/11 by 12:00 noon 1ELEPHONE: (707) 463-4221

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COUNTY OF MENDOCINO

BOARD OF SUPERVISORS
501 Low Gap Road • Room 1
Ukiah, California 95482

SWRCB EXECUTIVE

September 8, 2011

Ms. Jeanine Townsend, Clerk of the Board State Water Resources Control Board (SWRCB) 1001 I Street

Sacramento, CA 95814

Subject: Comment Letter - Phase II Small MS4 General Permit

Dear Ms. Townsend and Members of the Board:

Mendocino County appreciates the opportunity to provide comments on the subject of the Phase II Small MS4 General Permit (draft Phase II permit). Mendocino County was required to enter into the Phase II stormwater permit in 2005. Mendocino County has done its best to implement a stormwater management program to protect water quality in our two MS4 areas around Ukiah and Fort Bragg. Mendocino County is a member of the California Stormwater Quality Association (CASQA) who has thoroughly reviewed the draft Phase II permit and developed comments and recommendations which Mendocino County endorses.

Specifically, CASQA believes that the draft Phase II permit will pose significant challenges to the Phase II permittees, like Mendocino County, through a comprehensive and overreaching approach taken in the draft Phase II permit. This is of such concern that we respectfully request fundamental changes and time for the specialist to work with SWRCB. We urge the Board to delay the present schedule for approval of the revised Phase II permit and continue the conditions of the existing permit, which already affords useful stormwater protections.

In conclusion, we need to move forward to meet urban stormwater quality requirements prioritizing scarce Mendocino County General Fund resources in a thoughtful way.

Our staff is available for contact on this matter and looks forward to discussing these ideas with you in more depth should you or your staff desire – contact: CEO's Office 707-463-4441.

Sincerely,

KENDALL SMITH, Chair

Mendocino County Board of Supervisors

THE BOARD OF SUPERVISORS