



SAN LUIS OBISPO COUNTY
DEPARTMENT OF PUBLIC WORKS

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August 5 2014

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Subject: Comment– Proposed Trash Amendments to the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays and Estuaries of California and the Water Quality Control Plan for Ocean Waters of California

Dear Ms. Townsend and Members of the Board:

The County of San Luis Obispo (County) appreciates the opportunity to provide comment on the "Proposed Amendments To Statewide Water Quality Control Plans to Control Trash". The inclusion in the earlier stakeholder meetings was very helpful in raising our awareness of the State's approach to the trash problem in the waterways.

San Luis Obispo County shares the concerns highlighted in a letter to your Board from the Statewide Stormwater Coalition. Specifically, we would like to emphasize the following as important implementation conditions:

1. Entities with solid waste franchise authority are required to comply at no cost to the permittee
2. Permittee is not responsible for trash generated by State and/or Federal agencies

The County also has two additional comments to the draft plan:

1. It appears a permittee would have three months from date of notice by the permitting authority to determine either Track 1 or Track 2. We respectfully request this time frame be extended to six months. The additional time will give the permittee enough time to analyze which track best meets their local conditions.
2. A "one size fits all" statewide approach may not make sense, especially when so many regions have low level density and development. For example, the Central Coast Region only has 0.10% High Density Development and only 2.31% of the region is developed (Table 5). For these low development areas, a threshold (such as >25% of the catchment area has a priority land use) makes sense. This

allows the permittee to focus their limited monetary resources on the most problematic areas.

Thank you for your time and consideration of our comments. Should staff have any questions, please contact Mary Whittlesey at 805-781-5259.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mark Hutchinson', with a stylized flourish extending to the right.

Mark Hutchinson
Deputy Director
Public Works Department

C: Storm Water Coalition
c/o Mark Wolinski,
Office of the City Manager
City of Roseville
311 Vernon Street,
Roseville, CA 95678