



BOARD OF SUPERVISORS

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July 19, 2012

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

FRANK R. MECHAM, Supervisor District One
BRUCE GIBSON, Supervisor District Two
ADAM HILL, Supervisor District Three
PAUL TEIXEIRA, Supervisor District Four
JAMES R. PATTERSON, Supervisor District Five

Subject: Comment Letter – 2nd Draft Phase II Small MS4 General Permit

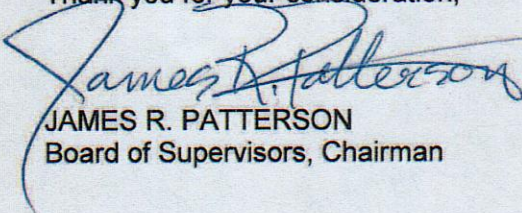
Dear Ms. Townsend:

The County of San Luis Obispo appreciates the opportunity to again provide comments on the draft General National Pollutant Discharge Elimination System (NPDES) permit for stormwater discharges from small Municipal Separate Storm Sewer Systems (MS4s). As previously stated, we are committed to maintaining the quality of our water resources as evidenced by our efforts to address long-standing water quality issues around Morro Bay estuary, our adoption of the Integrated Regional Water Management Plan and our adoption and implementation of our Stormwater Management Program well in advance of regulatory deadlines. San Luis Obispo County will continue to support efforts to ensure the health and vitality of our local streams, rivers, lakes and ocean.

We acknowledge the 2nd Draft Phase II Permit contains substantial revisions from the first draft and appreciate the State Water Resources Control Board for addressing a portion of our concerns. However, we find the draft continues to be determinative in nature and does not provide sufficient clarity for implementation or assurances that proposed measures, when implemented, will achieve the desired results. The draft Phase II Permit contains provisions that exceed federal requirements that potentially subject jurisdictions to litigation and additional cost.

We urge your Board to again reconsider the draft Phase II Permit. We support the comments and recommendations of the Statewide Stormwater Coalition (SSC) in their letter to your Board dated July 23, 2012. We request further revisions of the draft permit to better ensure the implementation of measures that are effective, economically realistic and consistent with the provisions of the Clean Water Act.

Thank you for your consideration,


JAMES R. PATTERSON
Board of Supervisors, Chairman

Cc: Charles R. Hoppin, Chair

