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THOMAS D. FAYRAM
Deputy Director

July 20, 2017

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



Submitted electronically – commentletters@waterboards.ca.gov

Subject: County of Santa Barbara Comment Letter – Small MS4 Permit Amendment

Dear Ms. Townsend:

The County of Santa Barbara is writing to comment on the proposed amendment to the General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (Small MS4 Permit), specifically Attachment G and associated Fact Sheet incorporating the Total Maximum Daily Load (TMDL) requirements. The comments included below focus on those TMDLs that affect Santa Barbara County, but are also of importance to the other Small MS4 permittees included in these TMDLs.

Comment 1. Attachment G does not include language describing how TMDL attainment will be evaluated.

The Basin Plan Amendments addressing each of the three TMDLs for which Santa Barbara County is a responsible party (Resolutions R3-2014-0009, R3-2013-0013, and R3-2012-0002) outline how Water Board staff will assess or evaluate attainment of the waste load allocations. This wording is absent from the proposed Attachment G. There is no explanation of how compliance with this permit provision will be determined by the Water Board.

Recommendation

Include the language from the Basin Plan Amendments and/or incorporate CASQA's recommendations. See attached Exhibit.

Comment 2. Attachment G language does not match the Basin Plan Amendment language.

The discrepancies between the adopted TMDL Basin Plan Amendments and the proposed Attachment G are significant. The TMDLs for the Santa Maria River Watershed: Fecal Indicator Bacteria, Nitrogen Compounds and Orthophosphate, and Toxicity and Pesticides, all contain

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added requirements for implementation including identification of additional milestones, measurable goals, measures and targets, and quantitative analysis to demonstrate achievement of wasteload allocation.

Recommendation

Revise the proposed Attachment G language to be consistent with the adopted TMDL Basin Plan Amendments. See attached Exhibit.

Thank you for the opportunity to submit these comments.

Sincerely,



Cathleen Garnand, Interim Manager
Project Clean Water

Attachment