



City of Santa Barbara

Public Works Department

www.SantaBarbaraCA.gov

October 16, 2006

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Administration

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Facilities

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Street Maintenance

Tel.: 805.564.5413
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Transportation Operations

Transportation Planning
Tel.: 805.564.5385
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Water Resources

Tel.: 805.564.5413
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Water Supply Management

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Downtown Parking

1115 Anacapa Street
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93101

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Ms. Sorrel Marks
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

SUBJECT: PROPOSED CHANGES TO GENERAL NPDES PERMIT FOR DISCHARGES WITH LOW THREAT TO WATER QUALITY, ORDER NO. R3-2006-0063

Dear Ms. Marks:

We are writing regarding proposed Order No. R3-2006-0063 regulating discharges with low threat to water quality. While we have just now become aware of the proposed order and have not had the opportunity to review it in depth, we have some concerns.

We understand the proposed order adds sampling and analysis requirements for a significant number of constituents that are unlikely to be found in the types of discharges regulated by this permit, and requires certified analysis for a number of constituents in samples collected above and below discharges into open natural channels. In an urban setting such as the City of Santa Barbara, these requirements will add substantial cost for our operations with no known water quality benefits to the receiving water body and increased administrative burden for us and for Regional Water Quality Control Board staff.

We understand that you will be receiving comments from the Santa Barbara County Water Agency. We have reviewed a draft of that letter and concur with their comments. In particular we concur with the suggestion that special circumstances be provided to allow a single application to cover similar discharges by a single agency, even if the discharges occur in multiple groundwater basins. We also support their suggestion that a change as significant as the one proposed would benefit from workshops with the agencies that will be affected.

We hope the board will defer action on this matter until the above noted concerns can be addressed. Thank you for the opportunity to comment. Please direct any questions to Bill Ferguson, Water Resources Supervisor, at 564-5571.

Sincerely,

Steve Mack
Water Resources Manager

BF/dm

cc: Jill Zachary, Creeks Division Manager
Cathy Taylor, Water System Manager
Cathleen Garnand, Santa Barbara County Public Works Department
123 East Anapamu Street, Santa Barbara, CA 93101

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Item No. 13 Attachment No. 8
Dec. 1, 2006 Meeting
Low Threat Permit