



## Department of Public Works

- Flood Control
- Operations
- Solid Waste Management
- Surveyor
- Transportation

Gerry Newcombe  
Director

December 14, 2016

Via Email ([sandiego@waterboards.ca.gov](mailto:sandiego@waterboards.ca.gov))

San Diego Regional Water Quality Control Board  
2375 Northside Drive, No. 100  
San Diego, CA 92108

Attention: Christina Arias

**RE: COMMENT – TENTATIVE ORDER NO. R9-2016-0205**

Dear Ms. Arias:

2016 DEC 19 AM 8:14

The County of San Bernardino and San Bernardino County Flood Control District (collectively referred to herein as "County") appreciate the opportunity to provide these comments to the San Diego Regional Water Quality Control Board ("Regional Board") regarding its Tentative Instigative Order R9-2016-0205, An Order Directing the Owners and Operators of Phase I Municipal Separate Storm Sewer Systems (MS4s) draining the Watersheds within the San Diego Region to submit Technical and Monitoring Reports Pertaining to the Control of Trash in Discharges from Phase I MS4s to Ocean Waters, Inland Surface Waters, Enclosed Bays, and Estuaries in the San Diego Region ("Tentative Order").

The County appreciates the Regional Board's cooperative approach in seeking public review and comment to the Tentative Order as the Tentative Order establishes the implementation of policy which could have broader implications for other agencies, such as the County. Therefore, the County respectfully submits this comment letter on the Tentative Order.

Also, as a threshold matter, the County notes the existing San Bernardino County MS4 permit, and most MS4 permits, already contain comprehensive municipal inspection programs, which encompasses construction, industrial, commercial and residential activities. See, e.g., Order No. 08-2010-0036 (NPDES No. CAS 618036), at Section X. Under those MS4 permits, the Permittees are already required to evaluate and prioritize sources of pollutants within their geographical boundaries, including trash and to take action for those sources causing impairments.

For brevity and to avoid duplication of comments, the County hereby supports and joins in the comments made by the City of San Juan Capistrano.

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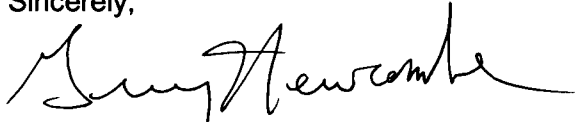
GREGORY C. DEVEREAUX  
Chief Executive Officer

The County's submittal of this letter shall not be deemed to preclude additional comments to the Santa Ana Regional Water Quality Control Board and other regional boards having jurisdiction over the County related to the control of trash and the County hereby reserves the right to raise additional comments in response to an order issued for Phase I MS4s related to the control of trash in San Bernardino County by the Santa Ana Regional Water Quality Control Board and other regional boards.

Please note the County Board of Supervisors has not adopted an official position on the Tentative Order, however, to assist the Regional Board with its consideration of the Tentative Order, the undersigned has provided the above comments.

We are available to provide any further assistance so the Regional Board clearly understands the comments submitted by the County. If you wish to discuss the County's comments, please contact Marc Rodabaugh or Harold Zamora at (909) 387-8109.

Sincerely,



**GERRY NEWCOMBE**, Director  
Flood Control District

cc: Kevin Blakeslee  
Harold Zamora  
Marc Rodabaugh