

PUBLIC WORKS CALAVERAS COUNTY



SERVICES
Transit
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Grading, Drainage and Erosion Control

Tom Garcia, P.E., Director

December 17, 2012



Jeanine Townsend, Clerk to Board
State Water Resources Control Board
10011 I Street, 24th Floor
Sacramento, CA 95814

SUBJECT: Comment Letter - 3rd Draft of the Phase II, Small MS4 General Permit

Please accept this correspondence as comments from Calaveras County on the State's third Draft of the Phase II, Small MS4 General Permit update. These comments support the California Stormwater Quality Associations' comment letter to you. We agree with the more-detailed correspondence from the noted agency and offer the following information for your consideration.

As noted in correspondence to you dated July 23, 2012, and September 8, 2011, the potential cost of compliance remains a significant issue. The Board's response to comments directs us to Section III, Economic Considerations of the Fact Sheet and notes that the draft order has been substantially revised to address the comments. In reviewing the subject section of the Fact Sheet, we appreciate the discussion regarding the potential costs of implementing the permit and agree with the State that quantifying costs at this time is not possible due to the varying complexities of storm water programs and particular issues that each jurisdiction faces. However, we are one of the jurisdictions who struggle to implement the mandates because the General Fund is the only source of revenue for the program. Although current funding is limited, we have implemented an effective program appropriate for this area under current permit requirements. It is our hope that, as the new permit requirements are implemented, these factors are taken into consideration.

It is our intent to implement a program that is as robust as funding permits. We remain committed to working collaboratively with other local agencies to ensure that there are no illicit discharges occurring in our communities. In this regard, we will continue to work closely with our Building Department, Environmental Management Agency, Planning Department, and Administration. Through this collaboration, we have been successful in our efforts kept costs down in the short run. However, we are concerned about the future



financial requirements, especially in light of predictions of significant program cost increases. Thus, we urge you to provide assistance to rural counties by funding a more-robust program as the need arises.

Sincerely,



Robert J. Pachinger, P.E.
Senior Engineer
R.C.E. #52667

RJP/tw

Via Email

cc: Jeanne Boyce, CAO
Tom Garcia, Public Works Director
Brian Moss, Environmental Management Agency Administrator
Rebecca Willis, Planning Director
Jeff White, Building Official
Richard Boon, Chair, California Stormwater Quality Association