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July 19, 2017



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

Re: Order No. 2013-0001-DWQ: Proposed Amendment to General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (MS4) (Implementing Region-Specific Total Maximum Daily Load Requirements)

Dear Ms. Townsend:

Heal the Ocean, a Santa Barbara-based citizens' action group, began in 2002 to review, comment, help, and (in some cases) challenge the County of Santa Barbara, as well as all municipalities within Santa Barbara County, in the development of their individual storm water permits as required by the NPDES Phase II Storm Water Regulations enacted as a result of the Clean Water Act Section 303(d).

In the intervening years we have made input into the updates of the 303(d) listings for Santa Barbara County, and in 2013 we were glad to see the State Water Board directing the Regional Water Quality Control Boards to review Attachment G -- Region-Specific Requirements, and propose revisions to implement existing TMDL requirements (Order 2013-0001DWQ).

We are pleased to see the arrival of the proposed (WQ 2017-DWQ) amendment calling for immediate action on TMDL-specific requirements for specific pollutants as required by Attachment G. The time allowed for municipalities and the County to develop TMDLs has been more than generous, and it is time to get moving on compliance so that impaired water bodies begin their overdue repair.

Heal the Ocean wholly supports this Proposed Amendment, and we encourage the State Water Board to approve it with all suggested changes/edits in place. We believe this strong language is critical to achieving water quality goals as outlined in the original Clean Water Act.

Sincerely,

A handwritten signature in black ink, appearing to read 'Hillary Hauser'.

Hillary Hauser, Executive Director

A handwritten signature in black ink, appearing to read 'Alex Bennett'.

Alex Bennett, Policy Associate