



# SAN BERNARDINO COUNTY STORMWATER PROGRAM

A Consortium of Local Agencies

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San Bernardino, CA 92415-0835  
(909) 387-8112 / FAX 387-7876

Member Agencies

Via Certified Mail – #7005 0390 0005 8855 9772

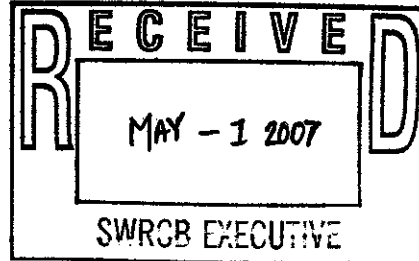
*City of Big Bear Lake*

April 25, 2007

*City of Chino*

Ms. Song Her, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

*City of Chino Hills*



*City of Colton*

10(NPD)-2.01

*City of Fontana*

**RE: Comments on the Draft Construction Stormwater Permit**

*City of Grand Terrace*

Thank you for the opportunity to provide comments on the draft Construction Stormwater Permit (Draft Permit). The San Bernardino County Stormwater Program (Stormwater Program) includes the 18 agencies listed on the left, with the San Bernardino County Flood Control District as the Principal Permittee. Our Program has implemented a Municipal Stormwater Permit (MS4 Permit) since 1990. Our interest in the Draft Permit stems from our oversight responsibilities for construction projects in our jurisdictions, and from our requirement to comply with the Construction Permit for local agency projects. We realize that writing the Draft Permit has been a very challenging task.

*City of Highland*

*City of Loma Linda*

*City of Montclair*

We have participated in the review of the Draft Permit as a member of the California Stormwater Quality Association (CASQA). The Stormwater Program wants to highlight the following significant concerns regarding the draft Permit, in addition to the strong support for the comments in the CASQA letter:

*City of Ontario*

*City of Rancho Cucamonga*

*City of Redlands*

- We are concerned that there will be a significant increase in the resources required for municipalities to oversee projects subject to the Draft Permit. What level of inspection detail and review of project documents will be expected or required? The education and competence required of inspectors is a significantly higher level than for the previous permit. At the least, there will be more intensive training requirements for inspectors. We ask that you consider what level of local agency oversight is expected, and provide appropriate guidance in the Draft Permit.

*City of Rialto*

*City of San Bernardino*

*City of Upland*

- We object strongly to the post-construction requirements in the Draft Permit. Our Program has a detailed set of post-construction requirements that apply to virtually all development projects under our Permittees' jurisdiction. These requirements are contained in the Model Water Quality Management Plan (WQMP), which was developed as required by our MS4 Permit and duly approved by the Santa Ana Regional Water Quality Control Board. The WQMP has requirements for hydromodification as well as pollutants likely to be generated by the project. We, therefore, request that the post-construction requirements be removed from the Draft Permit, or that language be added to exclude projects already subject to the WQMP from these requirements.

*City of Yucaipa*

*County of San Bernardino*

*San Bernardino County Flood Control District*

Comments on the Draft Construction Stormwater Permit

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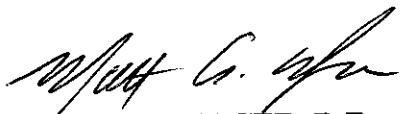
Page 2 of 2

Post-construction design and water quality features are best incorporated into a project at the earliest possible planning phase. It is not efficient and often not feasible to adjust project features at the Construction Permit stage.

We again state our support for the detailed comments provided by CASQA.

Thank you for your consideration.

Sincerely,



**MATT A. YEAGER, D.Env**  
Stormwater Program Manager  
San Bernardino County Flood Control District

MAY:nh/Comments-Draft Construction Stormwater Permit

cc: Michael Adackpara, Santa Ana RWQCB  
NPDES Coordinators  
VRO/MK/KB Reading file