



# COUNTY OF RIVERSIDE TRANSPORTATION AND LAND MANAGEMENT AGENCY



Juan C. Perez, P.E., T.E.  
Director of Transportation

## Transportation Department

May 22, 2012

Submitted via email to [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)



Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-2000

**Subject: Second Draft Statewide Phase II Small MS4 General National Pollutant Discharge Elimination System (NPDES) Permit**

Dear Ms. Townsend:

The Riverside County Transportation Department (Transportation Department) appreciates the opportunity to comment on the second Draft General National Pollutant Discharge Elimination System (NPDES) Permit For Storm Water Discharges From Small Municipal Separate Storm Sewer Systems (MS4s) (Tentative Order).

Riverside County falls under the jurisdiction of three Regional Water Quality Control Boards (Regional Boards)—the Santa Ana, San Diego and Colorado River Regional Boards. We appreciate the removal of the majority of the Census Designated Places (CDPs) that were listed in the previous Draft Tentative Order for Riverside County. However, the second draft Tentative Order (in Attachment A) still identifies the following small traditional MS4s in Riverside County:

Santa Ana Region

- Temescal Valley CDP

San Diego Region

- French Valley CDP

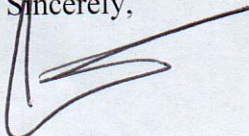
We believe the listing of the remaining two CDPs to be an inadvertent error and respectfully request that they are removed from the list. Both CDPs are in unincorporated areas of Riverside County, which are permittees under the Region's Phase I MS4 permit. Therefore, these areas will not be applying for coverage under the Tentative Order.

It was our understanding that the CDPs that are located within Phase I MS4 permit areas will continue to be covered under those Phase I MS4 permits.

Both the Santa Ana and San Diego Regional Boards have required our road projects within the unincorporated communities and contiguous smaller cities to have the same MS4 permit requirements as the large cities since the early 1990's. As such, requiring the Department to comply with a fourth MS4 permit for these two CDPs would create ambiguity for Transportation projects within those communities and thrust another set of rules and regulations on an already over-burdened regulatory framework. Furthermore, the budgetary and staffing impacts to the Department would be insurmountable and greatly impact the services and facilities the Department provides to its constituents.

The Transportation Department appreciates the opportunity to comment on the Tentative Order and your consideration of our comments. The Department looks forward to participating in the further development of the Tentative Order in a process to resolve the issues raised in this letter. If you have any questions regarding our comments, please contact Claudia Steiding at 951.955.1694.

Sincerely,



Juan C. Perez  
Director of Transportation and Land Management

cc: Charles R. Hoppin, Chair  
State Water Resources Control Board

Tom Howard, Executive Director  
State Water Resources Control Board

Robert E. Purdue, Executive Officer  
California Regional Water Quality Control Board, Colorado River Basin Region

David W. Gibson, Executive Officer  
California Regional Water Quality Control Board, San Diego Region

Kurt Berchtold, Acting Executive Officer  
California Regional Water Quality Control Board, Santa Ana Region

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Riverside County Flood Control and Water Conservation District