



PLACER COUNTY DEPARTMENT OF PUBLIC WORKS

Ken Grehm, Director
Peter Kraatz, Deputy Director

November 30, 2011

Harold Singer, Executive Officer
California Regional Water Quality Control Board
Lahontan Region
2501 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150

SUBJECT: PLACER COUNTY COMMENTS ON PROPOSED UPDATED NPDES PERMIT AND MONITORING AND REPORTING PROGRAM FOR THE CITY OF LAKE TAHOE, EL DORADO COUNTY, AND PLACER COUNTY (ORDER R6T-2011-(DRAFT))

Dear Mr. Singer:

This letter and attachments represent Placer County Department of Public Works' (DPW's) response to the above-referenced Draft Updated Waste Discharge Requirements/NPDES Permit and associated Monitoring and Reporting Program (referred to hereafter as "Permit") as provided in your letter dated October 31, 2011. For context, this response represents DPW's latest response in a series of previous iterations of the draft Permit.

Recent meetings between local jurisdiction and Lahontan staff along with DPW's recent draft permit update to our Board of Supervisors on October 24, 2011 largely form the basis of this letter and our attached, modified, draft permit version. Our intent as articulated in the draft Permit edits and comments (attached documents) can be summarized with the following concepts:

- Focus on the most cost-effective storm water elements and minimize those elements which are not.
- Emphasis on actions that have the greatest direct benefit to water quality.
- Reduced emphasis on: administrative actions, support for generic scientific research efforts, and duplicative agency permit processes and inspections.
- Proceed with TMDL implementation in a reasonable and sustainable level of effort based on available resources and sustainable costs.
- Monitoring efforts that focus on validating modeling results of registered catchments as well as validating proposed TMDL strategies.

Ultimately, the attached, modified, draft permit will translate into efforts well above and beyond what is required of the County under previous and current interim permit conditions. We believe that our proposed permit modifications fully support the Regional Board's TMDL implementation objectives, and provide for a reasonable, sustainable, and effective stormwater management

Mr. Harold Singer
November 30, 2011
Page 2

program. However, it should be noted that the timing for permit comment submittal to your Board has not allowed opportunity for our Board of Supervisors to review our modified version of the permit nor consider the cost implications thereof. We believe that our Board will be supportive of cost-effective and reasonable permit terms, and will be willing to allocate the funding necessary for program implementation.

We feel that the attached draft Permit substantially meets the requirements and goals of Lahontan's Basin Plan and the Lake Tahoe TMDL, focusing on actions that target the greatest potential gains for improved water quality for Lake Tahoe within funding limitations that these difficult times have exacerbated. We therefore respectfully request your consideration in accepting our proposed revisions for final adoption.

With due respect of the short timing between the deadline for permit comments and the Lahontan Board hearing to consider permit adoption on December 6th, DPW looks forward to addressing your Board at the hearing to further explain our proposal. Until then, we are available to discuss our proposal with you and your staff, and to answer any questions. Please contact our Water Quality Program Manager, Bob Costa, at (530) 745-7524 with any questions or comments that you may have.

Sincerely,



Ken Grehm, Director
Placer County Department of Public Works

Cc: Jennifer Montgomery, Dist 5 Supervisor
Robert Larsen, Lahontan RWQCB