



September 8, 2011

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100



Subject: Comment Letter – Phase II Small MS4 General Permit

Dear Ms. Townsend and Members of the Board:

Thank you for the opportunity to respond to the draft Phase II Small MS4 General Permit. Please accept this letter as the formal comment from the City of Santa Rosa to the State Water Resources Control Board on the June 7, 2011 version of the Draft NPDES General Permit and Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (Draft Permit).

As a Phase I community the City of Santa Rosa is concerned about the lack of consistency between the proposed Draft Phase II Permit and the current Phase I Permit. These inconsistencies prevent smaller Phase II communities from partnering with the Phase I communities in their Region to achieve water quality goals. Discrepancies in the Permits and resulting programs will cause confusion and frustration in the design community as neighboring cities will be operating under different requirements. A number of the programs proposed in the Draft Phase II Permit are more burdensome than those required in the Phase I Permit, without providing any additional water quality benefit. It is recommended that the Phase II communities are given the option of “becoming” a Phase I community. This would ensure regional consistency, increase the level of the Phase II programs, and strengthen the Phase I program by encouraging cooperative partnerships.

The City of Santa Rosa supports CASQA, California WaterReuse, and the Russian River Watershed Association’s specific comments and priorities presented in their respective comment letters. The City of Santa Rosa asks the State to consider these associations’ detailed comments as the permit is redrafted for the next review process. Specifically the City of Santa Rosa agrees with the assessment that the proposed Draft Phase II Permit should be revised to be consistent with the Region I Basin Plan, the Low Threat Discharge Basin Plan Amendment and the Phase I Permit and that overlapping regulatory language relating to the Industrial General Permit, the Water Efficient Landscaping Ordinance, and CALGreen should be removed.

The City of Santa Rosa believes that the proposed level of requirement will be unattainable by many Phase II communities and that the Board’s water quality objectives would be better obtained by supporting the transition of the smaller communities into the existing and established Phase I programs. Thank you for considering these comments during your review process.

Sincerely,

Miles Ferris  
Director of Utilities

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