

## **Mona Dougherty - Storm Water Runoff comments**

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**Date:** 7/1/2009 10:18 AM  
**Subject:** Storm Water Runoff comments

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To the North Coast Regional Water Quality Board

Re: Order No. R1-2009-0050, NPDES No. CA0025054, WDID No. 1B96074SSON

Waste Discharge Requirements for The City of Santa Rosa, the County of Sonoma, and the Sonoma County Water Agency

Storm Water and Non-Storm Water Discharges from Municipal Separate Storm Sewer Systems, Sonoma County

The Sonoma Coast Chapter of Surfrider Foundation strongly supports adoption of the draft Santa Rosa – Sonoma County MS4 NPDES Stormwater Permit. The draft permit is a well-written, comprehensive document that proactively addresses water quality issues in the watersheds and nearshore coastal waters of Sonoma County.

Our members are residents of the area who depend on clean water and healthy aquatic ecosystems to maintain their quality of life. In addition to the comprehensive requirements of the permit to "effectively prohibit non-storm water discharges into storm sewers and require controls to reduce the discharge of pollutants to the maximum extent practicable (MEP)," we appreciate that the permit expands the former permit boundaries and incorporates the Laguna TMDL and storm drain outfall monitoring.

We have the following specific comments on the draft permit:

- On pages 33 and 34 there is a discussion of the need to "mimic pre-development water balance" and make "pre-development water balance determinations." Elsewhere in the permit this subject is addressed by referring to maintaining "pre-development hydrology." The phrase "pre-development water balance" is not defined in Appendix C. We suggest either adding a definition of this phrase or clarifying this by referring to "pre-development hydrology" throughout the document.
- On page 39 reference is made to "BMPs that percolate storm water runoff through engineered soil." The term "engineered soil" should be defined in Appendix C.
- With regard to published resources on Low Impact Development (LID), we would like to make the North Coast Regional Water Quality Control Board and the Co-Permittees aware of an online summary that we have prepared of LID resources. This can be found at: <http://vp-owa.valpak.com/exchweb/bin/redir.asp?>

URL=<http://vp-owa.valpak.com/exchweb/bin/redir.asp?URL=http://www.surfrider.org/a-z/lid.php>

- On page 59, regarding trash management at public events, we recommend requiring not only adequate trash collection facilities and containers, but also recycling containers consistent with local county/city requirements and practices.

In regards to the changing of the boundaries: If you can implement the program elements for the areas in Sonoma County that are outside the permit boundaries as part of another program, that would be fine with us. Otherwise, we can jump back in when they reopen the Order.

Thank you for the opportunity to comment on this permit. We fully support this latest MS4 document in its latest form, and appreciate the work that has gone into making this happen.

Michael Frey

Co-Chair

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