

City of Cotati

Sonoma County, California



July 18, 2012

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

SUBJECT: DRAFT PHASE 2 MS4 GENERAL PERMIT COMMENTS



Dear Ms. Townsend and Members of the State Water Board,

The City of Cotati is a small city with a population of 7,400, and is a member of the Russian River Watershed Association (RRWA). As a member of RRWA, we support and concur with the RRWA comment letter dated July 23, 2012 (attached), but also wanted to directly comment to reiterate that the permit as drafted will require significant General Fund resources that we simply do not have.

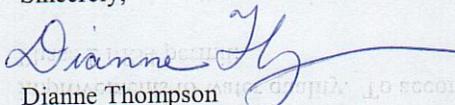
Our current MS4 permit has been manageable to administer. Outside of the initial costs to develop the original Stormwater Pollution Prevention Plan (SWPPP) and adopt the related ordinances, the plan has been administered with our existing resources. The proposed Phase 2 MS4 permit requires the creation of numerous plans, facility inventories, assessments, social media campaigns, and also requires a very large volume of reporting that all together is projected to increase costs 8 to 10 fold. This exceeds the ability of our beleaguered General Fund to absorb.

Given the limited resources, it is necessary to focus on cost effective and proven measures that result in direct improvements to water quality. To accomplish this, we request the following general changes to the current draft Phase 2 MS4 permit:

1. Reduce the excessive amount of reporting which will take significant staff time and instead focus on reporting what is necessary for the improvement of the stormwater programs; and
2. Eliminate or reduce in scope the special studies and assessments of best management practices (BMPs) and low impact development (LID) measures, as it doesn't make sense to run a research project on an individual permittee basis. This should be done on a regional or statewide basis to study effectiveness of these measures with a more robust sample size, and should be done by a state university or other institution with expertise in these areas and not by the permittees.

As it stands, the draft permit is a very resource intensive effort to improve stormwater quality, but without the funding to be successful. In addition to focusing on measures that have a direct water quality benefit, we request that the State Water Resources Control Board works with the legislature to provide funding mechanisms for stormwater programs in California. With these changes to how we run stormwater programs, we can all be successful in our efforts to improve the condition of California's waterways.

Sincerely,


Dianne Thompson
City Manager

Attachments:

1. Russian River Watershed Comment Letter, July 23, 2012.