



CITY OF PETALUMA

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PETALUMA, CA 94953-0061



David Glass
Mayor

Chris Albertson
Teresa Barrett
Mike Healy
Gabe Kearney
Dave King
Kathy Miller
Councilmembers

September 14, 2017

Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Re: Statewide Dredged or Fill Procedures

Dear Ms. Townsend:

The City of Petaluma is concerned that the proposed regulations will add significant cost and time delays in permitting flood control and public works projects. For many of the City's projects, these regulations require an additional permit on top of the permits issued by the U.S. Army Corps of Engineers, U.S. Fish and Wildlife, San Francisco Bay Conservation and Development Commission, and State Department of Fish and Wildlife. The proposed procedures have major overlap with the requirements of these other agencies. As written, the procedures leave great ambiguity and interpretation of requirements that apply, "where deemed necessary by the permitting authority." This ambiguity will add great cost and uncertainty in the timeline of the permitting process. It is requested that this language be more definitive on the requirements of the permits, leaving less up for interpretation, and that the overlap with other agencies is fully explored and redundant requirements be omitted.

The City of Petaluma would also like to ensure artificial wetlands constructed and currently used and maintained for disposal or re-handling of dredge spoils are excluded from being classified as waters of the state. This purpose may be covered under the purpose of 'settling of sediment' under Section II, paragraph 4. d. ii., but we request that this be made clear so there is no ambiguity in future interpretation of the policies.

If you have any questions on this matter, please contact Mr. Jason Beatty at (707)778-4514.

Sincerely,

Dan St. John, F-ASCE
Director, Public Works and Utilities Department

C: John C. Brown, City Manager

Public Works & Utilities

City Engineer
11 English Street
Petaluma, CA 94952
Phone (707) 778-4303

Environmental Services
Ellis Creek Water
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3890 Cypress Drive
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**Parks & Facility
Maintenance**
840 Hopper St. Ext.
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Transit Division
555 N. McDowell Blvd.
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