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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 and for extending the comment period. The City of Healdsburg would like to submit these comments for the record to the State Water Resources Control Board on the Draft NPDES General Permit and Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (Draft Permit).

29.1 → As a participating member of the Russian River Watershed Association (RRWA) we understand the benefit of coordinated regional programs for clean water and watershed enhancement. A significant number of our technical concerns have been noted in the comment letter from Jake Mackenzie, Chair, RRWA Board of Directors. We have also had the opportunity to review the comment letter from California Stormwater Quality Association and concur with all of their comments.

29.2 → Healdsburg's stormwater system is currently operated under the existing Phase II MS4 Program and the Draft Permit, as proposed, will have a significant impact on how we operate our system. The Draft Permit will require the City to meet or exceed the requirements of Phase I agencies in an accelerated timeframe. Healdsburg lacks the resources - technical, human, and most importantly the financial resources to meet the requirements of the Draft Permit. We have serious concerns about our ability to fund the new requirements, which, if implemented will have a significant impact to our residents and businesses.

29.3 → We would like to remind the Board of the draft legislation contained in Senate Bill 617 co-authored by Senators Ron Calderon and Fran Pavley addressing financial and administrative accountability in California State government. In our opinion, Senate Bill 617 is being proposed to specifically address the numerous concerns and impacts, with emphasis on financial impacts, associated with the Draft Permit language. The tremendous financial impacts that jurisdictions will be burdened with if the Draft Permit is adopted - will be just one more unfunded state mandate that will erode our ability to provide core services that our community expects—like public safety, street maintenance and parks and recreation.

We believe that given the current economic conditions in the State of California, now is not the time to propose additional regulatory burdens that will ultimately affect small business – the economic engines of our communities.

29.4

→ We respectfully request that the State Board not adopt the Draft Permit in its current form and direct staff to work with the operators of the small MS4 systems to redraft the permit in a manner that reduces the financial impacts and results in a permit system that is reasonable and practical to carry out – that will achieve meaningful water quality objectives in the most efficient and cost effective ways. This would include eliminating redundancy and excessive reporting requirements, and eliminating the proposed shift of monitoring and enforcement responsibilities from the state to local jurisdictions. We appreciate the opportunity to submit our comments and look forward to a revised permit that address the technical comments contained in the comment letter from the California Stormwater Quality Association, and one that meets the spirit and intent of Senate Bill 671.

Sincerely,



Michael Kirm
Public Works Director
City of Healdsburg