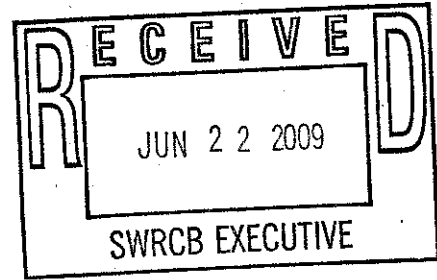




Public Comment
Dft Construction Gen. Permit
Deadline: 6/24/09 by 5:00 p.m.

June 22, 2009



State Water Resources Control Board
c/o Jeannie Townsend, Clerk to the Board
1001 "I" Street, 24th Floor
Sacramento, California 95814

**Board of Directors
Representing:**

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Chief Financial Officer

**SUBJECT: Sacramento Regional County Sanitation District (SRCSD)
Comments to Draft NPDES General Permit for Discharges of Stormwater
Associated with Construction Activities**

Dear Ms. Townsend;

Thank you for the opportunity to review the subject document. SRCSD provides wastewater collection and treatment services to 1.3 million residents of the greater Sacramento area. The following comments are being provided by SRCSD related to the draft construction general permit.

The State Water Board should consider working closely with the manufacturers of various Best Management Practices (BMP) products used in the state to ensure that stormwater BMP products will be manufactured and installed so as to achieve the new numeric limits. Compliance with the new numeric limits may be impacted, as stated in the Panel's Findings on Feasibility of Numeric Effluent Limits Applicable to Municipal Activities, by the selection, installation and maintenance of the installed products. There will likely be an associated learning curve resulting from use of a numeric limit versus a BMP approach that should be considered by the State in enforcing any penalties associated with water quality violations.

Page 7, Item 43 requires two appointed positions – the Qualified SWPPP Developer and the Qualified SWPPP Practitioner who must obtain appropriate training defined on pages 32-33. The State Water Board should allow sufficient time for dischargers to implement these new training requirements.

The Numeric Effluent Limitations included in section B on page 28 are assigned based on Risk Level 2 or 3. Section 8 on page 34 (and other pages and sections) discusses risk levels 2 and 3. Assignment of a site to risk level 2 or 3 is dependent on the Risk Determination Worksheet shown in Appendix I. This worksheet uses a page titled "LS". It is unclear on the sheet titled "LS" which values would be used for a number that falls in between the specific

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values shown on the table. For example 980 falls between 800 and 1000. Are the numbers under the column titled "Sheet Flow Length (ft)" upper limits? The worksheet should provide direction on how to interpret the table or interpolate numbers greater than or less than those specific values shown on the table. Also, please clarify values for sheet flow lengths exceeding 1000 ft?

The Sediment Risk Factor Worksheet may not work well for long, linear projects that have varying soil types and slopes. This is a comment specific to using the weighted average "K" and "LS" values. The entire project will be combined into a single risk category when multiple risk categories might be more applicable and protective of waterways. SWRCB staff should consider this when evaluating sites and SWPPP plans. A note could be added to the sheet titled "Sediment Risk" that provides an upper limit for use of a weighted average when calculating "K" and "LS" values.

Sampling for the discharge to receiving waters may not provide valid or useable information, depending on the proximity of the construction site relative to the receiving waters. Receiving waters will contain a mixture of various runoff flows from upstream locations which may make it difficult to determine the impact from a specific construction site runoff. This is particularly true during a rain event.

If you have questions or comments regarding the items above, please feel free to contact me at (916) 876-6038. We appreciate the opportunity to provide comments on this document.

Sincerely,



Lysa Voight, P.E.

Senior Civil Engineer

cc: Terrie Mitchell, SRCSD
Stan Dean, SRCSD
Stephen McCord, Larry Walter Associates