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## North Coast Regional Water Quality Control Board

November 25, 2014

Ms. Veronica Ferguson  
County Administrator  
County of Sonoma  
575 Administration Drive, Suite 104A  
Santa Rosa, CA 95403

Dear Ms. Ferguson:

**Subject:** Notice of Violation, County of Sonoma Municipal Storm Sewer System  
Inspection Summary

**File:** County of Sonoma, Municipal Storm Water Permit, Phase I MS4  
WDID No. 1B0215SSON

The North Coast Regional Water Quality Control Board (Regional Water Board) would like to acknowledge the County of Sonoma (County) for taking the time and effort to participate in two storm water municipal separate storm sewer system (MS4) permit inspections conducted on March 28, 2014, and May 13, 2014. The purpose of the inspections was to determine compliance with the County's implementation of the National Pollutant Discharge Elimination System (NPDES) Permit No. CA0025054, Waste Discharge Requirements Order No. R1-2009-0050 for Storm Water and Non-Storm Water Discharges from Municipal Separate Storm Sewer Systems (Permit).

During the March 28, 2014 inspection, compliance was assessed with Permit Part 4: Planning and Land Development Program, Part 5: New Development/Redevelopment Integrated Water Quality/Resource Plan, and Part 6: Implementation of New Development/Redevelopment Post-Construction BMPs (collectively referred to as "post-construction"). During the May 13, 2014 inspection, compliance was assessed with Permit Part 8: Development Construction Program as it relates to private construction.

Attached are the summaries for both inspections. Comments incorporated into the inspection summaries are based on information provided during the inspection and review of the 2012/2013 Annual Report.

Findings from the inspections and Annual Report review document violations of the Permit. Each violation is discussed below and details are presented in the inspection summary.

- The County has not obtained adequate legal authority to require implementation of the Low Impact Development Manual.
- The County has not developed a comprehensive system for tracking post-construction projects.
- The County has not developed procedures for conducting inspections to ensure proper installation of post-construction BMPs.
- The County has not developed a system to verify proper maintenance and operation of post-construction BMPs.
- According to the Annual Report, the County did not conduct pre-rain inspections at all construction projects over one acre during the 2012-2013 fiscal year.

The Regional Water Board expects the County to address the above violations, as well as other program comments described in the inspection summary. Please provide a schedule for reaching compliance regarding each violation and for addressing Regional Water Board comments within 45 days from the date of this letter.

If you have any questions regarding this matter, please contact Colleen Hunt of my staff at 707-576-2831 or [colleen.hunt@waterboards.ca.gov](mailto:colleen.hunt@waterboards.ca.gov).

Sincerely,

David F. Leland, P.E.  
Assistant Executive Officer

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Enclosure: MS4 Inspection Summary: Post-Construction  
MS4 Inspection Summary: Private Construction

cc: Reg Cullen, County of Sonoma, PRMD, [reg.cullen@sonoma-county.org](mailto:reg.cullen@sonoma-county.org)  
Nathan Quarles, County of Sonoma, PRMD, [nathan.quarles@sonoma-county.org](mailto:nathan.quarles@sonoma-county.org)