

Mona Dougherty - Comments on Santa Rosa and Sonoma County Discharge Requirements document

From: "Tom Kuhn" <tkuhn@burbankhousing.org>
To: <MDougherty@waterboards.ca.gov>
Date: 10/6/2008 10:10 AM
Subject: Comments on Santa Rosa and Sonoma County Discharge Requirements document

Hello Mona,

In a meeting earlier today with Stephen Bargsten on another subject, he suggested I contact you to make comments on the Waste Discharge Requirements For The City of Santa Rosa, the County of Sonoma, and the Sonoma County Water Agency Storm Water (Wet Weather) and Non-Storm Water (Dry Weather) Discharges from Municipal Separate Storm Sewer Systems Sonoma County.

My comment is to recommend that rather than require developers to mitigate on a project-by-project basis that they should be able to elect to pay an in-lieu fee. These fees could then be used by the municipality to develop broader measures that would allow treatment of storm water runoff on a larger, and more cost-effective scale.

The advantage of this approach is that it would have a net increase in the quality of storm water that is running to local streams and rivers. This is as opposed to developers treating runoff only from their own new projects, which would do nothing for the runoff from existing developed areas. The second advantage is that such an in-lieu fund would enable larger treatment projects which would ultimately be more cost effective.

Please let me know if you have any questions.

Thanks,
Tom

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