



October 20, 2008

HAND DELIVERED

Catherine E. Kuhlman, Executive Officer
North Coast Regional Water Quality Control Board
5550 Skylane Boulevard
Santa Rosa, CA 95403

SANTA ROSA FIRE DEPARTMENT COMMENTS ON ORDER NO. R1-2208-0106 SANTA ROSA AREA DRAFT NPDES STORM WATER DISCHARGE PERMIT

Dear Ms. Kuhlman:

On September 9, 2008, Order No. R1-2008-0106, NPDES No. CA0025054, Draft Storm Water Permit (Draft Permit), for County of Sonoma, City of Santa Rosa (City) and the Sonoma County Water Agency (Permittees) was issued. The Santa Rosa Fire Department (Fire Department) and our regional cooperators are quite frankly alarmed by the extent of the prohibitions, requirements and/or suggestions as outlined in the Draft Permit.

Waste Discharge Requirements

EMERGENCY FIRE FIGHTING ACTIVITY (pp37) The Fire Department responds to over 700 fires per year. As a firefighting agency we rely on the ability to quickly secure a water supply, deploy hoselines and aggressively attack the fire. Our priorities are life safety, values at risk and the environment. Our firefighters are rigorously trained to effectively seek out the source of the fire and extinguish the blaze by whatever means are at their immediate disposal. This typically will include the use of water from a static water source such as a fire hydrant.

The successful extinguishment of a fire relies on some or all of the following elements: early detection, prompt dispatch of fire units, orderly accomplishment of preassigned tasks and an unfettered water supply.

Hostile fires are a threat to the community, air quality and the environment. As a matter of practice the Fire Department will routinely request vacuum trucks to ensure that contaminants are prevented from entering local streams. It is impractical and cost prohibitive for the Fire Department to allow for fires to burn while attempting to locate storm drain inlets. Often times we encounter structure fires in the middle of the night while the public is most at risk. Firefighters would be frequently placed in an impossible situation, choosing life safety over "potential" runoff. We would be unable to comply with this unfunded mandate.

TRAINING (pp38) Due to the hazardous nature of firefighting, training is an integral and legally required element of our operation. Water by nature is extremely heavy (8.3 lbs per gallon). In order to experience the

Fire Department
2373 Circadian Way • Santa Rosa, CA 95407
Phone: (707) 543-3500 • Fax: (707) 543-3520
www.srcity.org

weight of hoselines and the nozzle reaction associated with high pressures and flows, firefighters must train under actual conditions. This activity cannot be duplicated in any other manner. Flowing water is required in order to teach the correct and judicious application of fire streams. Fire crews are trained to operate as a team; each performing a valuable function. When a fire occurs they must be very competent in their roles in order to safely meet our public mandate to speedily put out fires as they happen.

In addition the City has gone to significant expense in placing a foam containment system at our Fire Training Center. This innovative secondary containment traps foam and prevents the deleterious effects of firefighting agents and surfactants from entering the riparian corridor. Ground infiltration is typically not an option for our personnel unless training for wildland firefighting. We avoid allowing powerful hose streams from denuding the landscape or causing erosion.

Preventing runoff from all training activities is again cost prohibitive and would essentially reduce the effectiveness of our firefighting personnel. We are currently unable to meet this element of the Draft Permit.

HYDRANTS (pp38) The City has over 6000 fire hydrants in a 45 square mile area. These emergency water supply sources ensure that the Fire Department is capable of reaching required fire flows during firefighting activities. Testing ensures that hydrants are in full working order and verifies their flow capacity. The annual hydrant testing also helps keep the hydrants flushed from any foreign debris that may clog pumps, hose and nozzles impairing firefighting capability. The test provides information concerning pressure and the amount of water available at each hydrant. A diffuser is utilized during this process and minimal flows are needed to determine the working condition/capability of the hydrant. City workers are trained to limit runoff, waste of the resource, damage to vegetation, streets and infrastructure.

As a municipal firefighting agency the ability to have a readily available and reliable emergency water supply on a 24 hour basis is critical to our success. Over 15 years ago the maintenance of our hydrants was assumed by the Utilities Department. As the stewards of our water supply, we are confident that they continue to utilize the best management practices in the maintenance of the emergency firefighting fire hydrant system.

In addition to the prohibitive cost of implementing these measures, the public is potentially at risk due to lack of maintenance and testing of fire hydrants.

POTABLE WATER DISCHARGES The allied fire agencies in Sonoma County recently adopted the 2007 California Code. This was a monumental achievement for the county and the participating municipalities, districts and agencies. A single code developed to protect the citizens of our communities. One of the requirements within this unified document is the testing of sprinkler systems.

Automatic sprinkler systems are recognized as an integral part of a community fire protection system. California state law requires the quarterly opening of sprinkler test valves in order to ensure the alarm activates. The owner of the system is required to ensure these tests are performed. When performing the test the owner, maintenance or testing firm may be in violation of the Draft Permit. If the test is not done they are in violation of state law. Small amounts of water are discharged during this procedure and the enhancements to life safety and property conservations have been amply demonstrated through study and actual events. This element of the Draft Permit would be extremely difficult to comply with and unworkable to enforce.

FIREFIGHTING MISSION As a profession the national fire service is a supporter of preserving the environment. Locally, 40 members of the Santa Rosa Fire Department are hazardous materials technicians and the remaining 100 are trained at the hazardous materials operational level. In addition the command staff of the Fire Department has received specialized training in the management of hazardous materials incidents.

We recognize and support the intent of the Draft Permit is to ensure the reduction and/or elimination of pollutants. However due the constraints placed on the Fire Department to accomplish our firefighting mission and rapidly extinguish fires on discovery, we are formally requesting exemptions from the following Waste Water Discharge Requirements:

Flows from emergency fire fighting activity
Fire Hydrant Testing
Discharges from potable water Sources

We would welcome working with your staff to provide suitable language to amend the current Draft Permit and meet the intent of the federal Clean Water Act.



BRUCE H. VARNER

Fire Chief

Fire Department

cc: Jeff Kolin, City Manager
Greg Scoles, Deputy City Manager
Miles Ferris, Director of Utilities
Rick Moshier, Public Works Director
Caroline Fowler, City Attorney