



AMERICAN COUNCIL OF ENGINEERING COMPANIES
California

NORTH COAST CHAPTER | PO BOX 1563 | SANTA ROSA, CA | 95402

N C R W Q C B

October 21, 2008

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Catherine Kuhlman
California North Coast Regional Water Quality Control Board
5550 Skylane Blvd., Suite A
Santa Rosa, CA 95403

<input type="checkbox"/> EO	<input type="checkbox"/> WMgmt	<input type="checkbox"/> Admin
<input type="checkbox"/> AEO	<input type="checkbox"/> Timber	<input type="checkbox"/> Legal
<input type="checkbox"/> Reg/NPS	<input type="checkbox"/> Cleanups	<input type="checkbox"/> Date

Re: Order No. R1-2008-0106
NPDES No. CA0025054
WDID No. 1B96074SSON

Dear Ms. Kuhlman,


The American Council of Engineering Companies (ACEC) would like to respond to the Waste Discharge Requirements for the City of Santa Rosa, the County of Sonoma, and the Sonoma County Water Agency. The members of ACEC are supportive of storm water treatment and limiting the channel forming discharge. We also support many of the points contained within the subject document. We offer the following comments:

- This order will create additional demands on the already stressed City budget. We would ask that an economic report be prepared to assess an approximate cost of the staff necessary to comply. Without this analysis, the extent of "maximum extent practicable" cannot be quantified.
- It is our opinion that the focus of the document is on new projects. Given the state of the economy in general and the depression that the housing industry is experiencing in particular, we believe that this focus is misplaced. The focus would be more appropriately placed on existing development. It appears that during the next five years, growth in the City of Santa Rosa and County of Sonoma will be minimal. More inspections and criteria on smaller projects may not be warranted. We, therefore, object to requirements for design and implementation of post-construction treatment of industrial and commercial projects with 5,000 sq. ft. of impervious surface. The present criteria which required all development projects with 1.0 acre or greater of impervious surface is adequate and appropriate.

- The preparation of a "New Development/Redevelopment Integrated Water Quality/Water Resource Plan" is not warranted because the general plans of the City and the County currently mandate city centered growth. Most of the development that is constructed is within the urban growth limits. It would follow, therefore, that we are proposing only infill projects using the Water Agency channels that are presently fully constructed.
- It is our opinion that many of the requirements of the "Outreach and Education" section of the order are more efficiently and effectively handled by the School District. Professional teachers would educate the benefits of storm water treatment while teaching the core subjects of reading and writing.
- The requirement to install and maintain trash excluders in commercial areas, industrial areas and near educational institutions is not practical given the state of the city budget for construction and maintenance.
- The level of storm drain maintenance required by the order seems excessive.
- Given that most of the storm water from the urban areas are conveyed by constructed channels, we would suggest that the hydro-modification control criteria is excessive. The channels have been designed to contain the flow from the ultimate urban buildout.
- The interim criteria requiring the duration, time of concentration and volume of flows from new projects to match within one percent of the storm event, pre-development peak flow and volume hydrograph is not practical or attainable. We would urge the Water Quality Control Board to work with the Cities, County and the private sector to obtain achievable and practical criteria.

We hope our comments are helpful and appreciate the opportunity to submit them to you.

Sincerely,

A handwritten signature in black ink, appearing to read "Mousa Abbasi". The signature is fluid and cursive, with the first name "Mousa" and last name "Abbasi" clearly distinguishable.

Mousa Abbasi
President, ACEC