

ATTACHMENT 2

OCT 22 2008

October 22, 2008

Sonoma County Water Agency

<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

Comments Regarding Monitoring and Reporting Program No. R1-2008-0106  
NPDES No. CA0025054

The Reissuance of NPDES  
Permit No. CA0025054

For suggested revisions to the text of the Draft Permit, underline is shown for suggested additions, and ~~strike-out~~ is shown for suggested deletions.

Comments Regarding Draft Storm Water (Wet Weather) and Non-Storm Water (Dry Weather) Discharges from Municipal Separate Storm Sewer Systems For The City of Santa Rosa, the County of Sonoma, and the Sonoma County Water Agency follows.

### **Monitoring and Reporting Program**

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#### **Section A - Chemical Monitoring:**

##### **Section 1 Outfall Chemical Monitoring:**

**Comment:** The Water Agency does not own any outfalls; therefore, the Water Agency will not implement any part of Section A – Chemical Monitoring Subsection 1a and 1b Outfall Chemical Monitoring of this Order.

#### **Section B - Aquatic Toxicity Monitoring (Wet Weather)**

**Comment:** The Water Agency does not have land use authority and is unable to regulate storm water discharge; therefore, the Water Agency will not implement any part of Section B – Aquatic Toxicity Monitoring (Wet Weather) of this Order.

#### **Section C – Bioassessment**

**Comment:** The Water Agency does not have land use authority and is unable to regulate storm water discharge; therefore, the Water Agency will not implement any part of Section C – Bioassessment of this Order.

#### **Section D - Special Studies**

Temperature Monitoring

**Comment:** The Water Agency does not have land use authority and is unable to regulate storm water runoff; therefore, the Water Agency will not implement any part of Section D – Special Studies, Temperature Monitoring Program of this Order.

#### Bacteria Monitoring

**Comment:** The Water Agency does not have land use authority and is unable to regulate bacteria runoff within City Limits of Santa Rosa; therefore, the Water Agency will not implement any part of Section D – Special Studies, Bacteria Monitoring of this Order.

#### Visual Flow Monitoring

**Comment:** This section is unclear. What is the Regional Boards definition of excessive summertime flows? Water Agency will monitor flood control channels it owns in fee during the summertime. If Water Agency sees excessive flows leaving a storm drain discharging into a flood control channel the Water Agency owns in fee, then the Water Agency Storm Water Coordinator will attempt to contact person identified in Part 2 – Public Information and Participation Program, Section 2 – Residential Program, Part b Public Reporting.

#### Atmospheric Deposition

**Comment:** The Water Agency does not have land use authority and is unable to regulate Atmospheric Deposition in the Santa Rosa Area; therefore, the Water Agency will not implement any part of Section D – Special Studies, Atmospheric Deposition Study of this Order.

#### Kelly Farm Nutrient Monitoring

**Comment:** The Water Agency does not have land use authority over Kelly Farm; therefore, the Water Agency will not implement any part of Section D – Special Studies, Kelly Farm Nutrient Monitoring Study of this Order.

#### BMP Effectiveness Special Study

**Comment:** The Water Agency does not have land use authority, but will work with others Permittees on Section D – Special Studies, BMP Effectiveness Special Study of this Order.

#### Volunteer Monitoring Programs

**Comment:** The Water Agency has a number of concerns with the volunteer Monitoring Program. 1) How many watersheds are there in the expanded Permit Boundary? 2) Does the Regional Board expect every watershed to have a Volunteer Monitoring Program? 3) If not, then Regional Board should specify which watershed needs Volunteer Monitoring Programs? 4) What happens if volunteers cannot be found? 5) Is every watershed in the expanded permit boundary impaired? 6) With the potential for the number of watersheds to be in the hundreds, who will QA/QC the volunteer monitoring program? 7) How will this program be funded? 8) As the Water Agency has no land use authority, our participation will be limited.