



**Laguna  
de Santa Rosa  
Foundation**

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January 7, 2009

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

RE: Low Threat BPA

Dear Ms. Kuhlman:

The Laguna de Santa Rosa Foundation is a non-profit organization working to preserve, restore and enhance the Laguna de Santa Rosa, the largest freshwater wetland in Sonoma County. The Foundation works collaboratively with the Laguna's many public and private stakeholders to improve the Laguna through research, problem solving, public education, and implementation of habitat restoration programs.

The purpose of this letter is to express the Foundation's support for the proposed *Basin Plan Amendment to Establish Exception Criteria to the Point Source Waste Discharge Prohibitions by Revising the Action Plan for Storm Water Discharges and Adding a New Action Plan for Low Threat Discharges (Low Threat BPA)*. The Low Threat BPA is needed to address conflicts between regional and statewide permits and the Basin Plan prohibitions and to remove an obstacle to habitat restoration and water recycling projects that would have a beneficial effect on the Laguna de Santa Rosa and North Coast watersheds. Specifically, we concur with the Staff Report which concludes that the proposed Low Threat BPA will provide a higher degree of water quality protection by acknowledging that these low threat discharges exist and providing a regulatory program that allows the discharges to occur under prescribed conditions.

The Foundation commends Regional Water Board staff for its effort to bring this important policy matter to the Board for consideration and thanks the Board for making this possible. Please do not hesitate to contact me if you have any questions or needs for further information from us regarding this matter.

Sincerely,

Dan Schurman  
Executive Director

NCRWQCB

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