



Sonoma County Water Coalition

55 Ridgeway Avenue, Santa Rosa CA 95401
707-575-5594

NCRWQCB

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

JUL 23 2007

Attn: Catherine Kuhlman: Executive Officer

<input checked="" type="checkbox"/> ASO	<input type="checkbox"/> WMgmt	<input type="checkbox"/> Admin
<input type="checkbox"/> AEO	<input type="checkbox"/> Timber	<input type="checkbox"/> Legal
<input checked="" type="checkbox"/> Reg/NPS	<input type="checkbox"/> Cleanups	<input type="checkbox"/> Data
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July 18, 2007

Re: Basin Plan Amendment to Allow Incidental Run-off

Dear Ms. Kuhlman and Board Members:

The Sonoma County Water Coalition includes more than 30 organizations representing more than 25,000 concerned citizens. We support effective water quality policies throughout Sonoma County and strongly support water reuse to offset the use of potable water within urban service areas. We do, however, have concerns that the proposed Basin Plan Amendment concerning "incidental runoff" would adversely affect water quality in the Russian River basin. We therefore disagree with the views of the Russian River Watershed Association as stated in their letter dated June 21, 2007, to your Board.

We request that the use of recycled water include practices and monitoring, with performance criteria, that will provide a level of assurance that recycled use will not adversely affect water quality objectives or beneficial uses, and that all wastewater used for irrigation will meet waste discharge requirements.

Our concerns are prompted by the following issues:

In summer months the flow in creeks is low and cannot assimilate incidental wastewater discharges. Because this is the time of greatest recreational use and greatest vulnerability to toxins of all kinds, no runoff entering gutters, storm drains, ditches, streams, rivers, or the Laguna of any kind should be allowed. The summer discharge prohibition has been in effect since the late 1970's and should continue indefinitely.

Many people use pesticides on their lawns and many of these pesticides have estrogenic properties and can cause neurological, developmental, reproductive, and cancer-causing health problems for humans and wildlife. No irrigation runoff should be allowed from sites where potentially harmful chemicals are used or where biosolids have been applied. All irrigated areas should have mandated safeguards to prevent run-off from the site and have active enforcement measures in place.

Members: * Atascadero/Green Valley Creek Watershed Council * Coalition for Unincorporated Sonoma County * Community Clean Water Institute, * Friends of Mark West Watershed * O.W.L. Foundation * SWiG (Sebastopol Water information Group) * Valley of the Moon Alliance * Supporting Organizations: Bellevue Township * Blucher Creek Watershed Council * Coalition for a Better Sonoma County * Coast Action Group * Coastal Forest Alliance * Community Alliance with Family Farmers (N.Coast Chapter) * Earth Elders of Sonoma County * Forest Unlimited * Forestville Citizens for Sensible Growth * Friends of the Eel River * Friends of the Gualala River * Graton Community Projects * Laguna Lovers * League of Women Voters of Sonoma County * Madrone Audubon Society * Mark West Watershed Alliance * Occidental Arts and Ecology Center * Petaluma River Council * Russian River Advocates * Russian River Chamber of Commerce * Sierra Club (Sonoma County Group) * Sonoma County Conservation Action * Town Hall Coalition * Western Sonoma County Rural Alliance *

The Laguna is listed as impaired for nitrogen, phosphorus, dissolved oxygen, temperature, and sediment. Incidental runoff will cause nutrient rich waters to continue entering the Laguna and further impair its water quality. This in turn also exacerbates Ludwigia growth, the exotic plant wreaking havoc in the Laguna area. The cumulative impacts of numerous incidental runoff events can be devastating to the Laguna waterways and downstream beneficial recreation use.

We ask that the following legal preconditions to a Basin Plan Amendment be included by the Board in their environmental document:

- (1) Discussion of how this Basin Plan Amendment meets conditions set forth in Water Code Section 13242;
- (2) A description of actions that will take place to assure the water quality objectives will be met and that beneficial uses will be protected (this description should include performance standards;
- (3) A description of the plan for monitoring performance as a means assuring efficacy and compliance, and a timeline for the implementation of the action and monitoring programs.

As the Laguna de Santa Rosa is listed as impaired by pollutants known to be in recycled waste water, and distribution of such recycled waste water is a controllable source of pollutants, discussion and analysis should be provided to demonstrate how this Basin Plan Amendment complies with Basin Plan anti-degradation language.

The preparation and approval process of a Basin Plan Amendment must go through CEQA analysis. CEQA also requires the above noted analytic, deliberative, and mitigatory process. We add our comments with the intent that all aspects of the Public Resources Code, Water Code, and the Basin Plan for the North Coast Region be the basis of good project design and resource protection.

We would appreciate your consideration of these issues.

Sincerely,



Stephen Fuller-Rowell
Sonoma County Water Coalition

cc: Russian River Watershed Association, attn: Jake McKenzie & City Council Members