

**From:** Mona Dougherty  
**To:** Clyde, Lauren; Lundborg, Holly  
**Date:** 9/4/2007 11:30 AM  
**Subject:** Fwd: Re: More reasons why we should be concerned

more comments that apply both to the resolution and BP amendment.

>>> John Short 9/4/2007 10:55 AM >>>

>>> "Brenda S. Adelman" <[rrwpc-1@comcast.net](mailto:rrwpc-1@comcast.net)> 9/4/2007 8:53 AM >>>  
John:

I truly appreciate your response. However, there is "...many a slip between the cup and the lip." We both agree that currently there is a great deal of urban runoff. I can understand that from your point of view, it is much better to allow some runoff, rather than try to regulate it all. It is also true that you will probably NEVER have all the resources you need to properly regulate this problem, no matter how much you loosen the rules.

You are opening the door for extensive legal arguments around the definition of "incidental". You will be providing people with more opportunities to spin the truth as to what comprises an "incidental" runoff, since usually no one is present to witness the incident. This will be the wormiest can of worms.

What you are really doing however is taking away the possibility of citizen lawsuits in this matter. As far as I can tell, there has been only one in all the years that SR has been irrigating and that incident is driving this train. As long as these discharges are illegal, there is an opportunity for enforcement. By making certain discharges "legal", I believe you are creating more opportunities for increased pollution at a time when creeks and streams are most vulnerable and human use is high.

I think very highly of you and your staff, but on this, we probably have to agree to disagree.

Brenda

On 9/4/07 8:50 AM, "John Short" <[JShort@waterboards.ca.gov](mailto:JShort@waterboards.ca.gov)> wrote:

> Brenda - Thank you as always for your input. First of all, staff is acutely  
> aware that we are dealing with a "waste" that, if used inappropriately, can  
> impact water quality and public health. This can also be said for other  
> summer nuisance flows that occur daily in our urban areas. Currently all of  
> these summer flows to regulated storm drain systems are prohibited. However,  
> one just needs to drive around on a hot summer day and see many examples of  
> where this is happening. Should we be fining all of our storm water  
> municipalities for this? If we exempt certain low-threat discharges from  
> storm drains and initiate a program for inspection, complaint response,  
> monitoring and enforcement by the storm water staff, I believe we will see an  
> improvement over the status quo. In addition, the recycled water users guide  
> developed by Santa Rosa is a good model for the installation and use of  
> recycled water. Note - discharges of recycled water from agricultural lands  
> will still be prohibited.

>  
>>>> "Brenda S. Adelman" < [rrwpc-1@comcast.net](mailto:rrwpc-1@comcast.net) > 8/31/2007 4:18 PM >>>

> John, Charles, & Paul:

>  
> I am extremely unhappy with the resolution on "low threat discharges". It  
> looks like your Agency is preparing to rescind the Summer Discharge  
> Prohibition while referring to it as no longer necessary. Please read the  
> attached articles and ask yourselves how many apply in this situation? I  
> know so many people with cancer now; in many cases people younger than  
> myself. The Resolution seemed quite extensive. It makes me sick that you  
> are moving forward with this without fully knowing what harm you will cause.

>  
> Brenda

>  
> PS: Many of the items in the first article don't directly apply to our  
> circumstances, but enough are relevant to make it worth passing on. Also,  
> in some cases, tweaking them a little makes them pertinent.

>  
>  
>  
>  
> ----- Forwarded Message

> From: "Brenda S. Adelman" < [rrwpc-1@comcast.net](mailto:rrwpc-1@comcast.net) >  
> Date: Fri, 31 Aug 2007 16:04:22 -0700  
> Subject: More reasons why we should be concerned

>  
> Friends:

>  
> Here are three articles which are part of Rachel's latest newsletter. I  
> highly recommend their publication and have found their information on the  
> cutting edge. I have personally experienced many of the tactics described  
> in the first article. I had conversations with Dr. John Goffman and  
> supported his organization. He was a very kind and brilliant man whose  
> truth was too often denied by the establishment. If you want more  
> information on why we should NOT turn to nuclear energy as a cure for  
> greenhouse gases, you should read his work. As for the birds, Rachel  
> Carson's greatest fears appear to be coming true.

>  
> Have a great holiday weekend.

>  
> Brenda

>  
> PS: Read #12 in the first article and apply it to Dr. Goffman in the third.

>  
>  
>  
> ----- End of Forwarded Message

>  
>