

From: Brenda Adelman <rrwpc@comcast.net>
Sent: Saturday, December 15, 2012 5:09 PM
To: Reed, Charles@Waterboards
Cc: Alan Levine; David W. Smith; SCWC; David Noren
Subject: RRWPC Comments on SR's Nunes Dairy Nutrient Offset Project Proposal
Attachments: WATQUA124 Nunes Dairy SR NPDES Off-set Request.doc; Letter to RB1-re nurtrient offsets.doc

Importance: High

Dear Charles:

I am writing in regard to Santa Rosa's Offset Credit Proposal fo Nunes-Ocean View Dairy BMPs.

I have not written specific comments for this proposal because I believe the two attached documents address our concerns. We totally support the letter from Coast Action Group and believe they cover all the main points better than we could have. I also enclose our comments on the Baretta Dairy submitted last July. Most of the concerns we expressed then, and are expressed even more fully in Alan Levine's recent letter now, are applicable to this current project.

In our verbal comments to the Regional Board at their December meeting, we stated that we were concerned that land owners were allowed to degrade the land with their commercial operations from which they derive personal income, and then the government, (in this case Santa Rosa) comes along and bails them out by paying for rehabilitation projects to address the problem.

Another major concern is that your agency opened a public comment period, members of the public submitted comments, and then projects got approved with no statement about public input. It seems as though the issues raised by the public should be addressed in some format before approval and that staff should be held publicly accountable for their decisions where a public comment period had been held.

I can surmise that your agency feels that cleaning up a toxic mess is better than not, and that this is an expedient way to deal with a difficult issue. None the less, there are laws that must be followed holding polluter's feet to the fire when they degrade the environment. It behooves your agency to convince polluters that they must comply. And it doesn't happen when you give them roses. As you know, it takes both carrots AND sticks to get messy problems addressed.

I am also deeply concerned by the lack of rigorous CEQA application in these offset proposals. There needs to be other alternatives considered; we strongly support those mentioned by Alan Levine. Perhaps there are even others not thus far mentioned. It would seem that a meeting with the public to cull out ideas about this could be fruitful. Certainly the TMDL process will further motivate such involvement.

Thank you for the opportunity to comment.

Brenda Adelman
Russian River Watershed Protection Committee
(707) 869-0410