



COAST ACTION GROUP  
P.O. BOX 215  
POINT ARENA, CA 95468

July 1, 2009

John Short  
Regional Water Quality Control Board  
North Coast Region  
5550 Skylane Blvd.  
Santa Rosa, CA

**Subject: Proposed Renewal of Waste Discharge Requirements, Order No.  
R1-2009-0050, NPDES No. CA0025054, WDID No. 1B96074SSON  
For The City of Santa Rosa, the County of Sonoma, and the Sonoma County Water Agency**

**Amendment to Coast Action Group Comments of June 30  
Please replace the discussion of the proposed Boundary changes in the June 30  
document with the discussion included (below) – as amended comments.**

### **Permit Boundary**

Coast Action Group strongly disagrees with the proposal to reduce the boundary from the original iteration of this permit – to include only the Laguna and Mark West Creek watersheds.

In the first iteration of this permit, and in the Boundary section of this permit, the Regional Board logically argues for an expanded permit boundary so as to include all waters (impaired or otherwise) under the regulatory authority of the co-permittees – and – to include such waters in future programs and policy (TMDLs, General Plans, Zoning Code, and Ordinance) so as the co-permittees and the Regional Board can assess, manage, and monitor such programs in an economic and effective manor – in compliance with mandates of the Basin Plan, Clean Water Act, and Coastal Zone Management Act.

Fragmentation of authority and responsibility will not lead to effective control of stormwater pollution issue in Sonoma County - and on impaired waterbodies. Thus, linking responsibility of co-permittees and their related authorities and programs in a co-operative and flexible process in not only logical – it is the only way possible to address stormwater issue with any chance of success in the mandated attainment of Water Quality Standards in the County.

Likewise, fragmentation of areas to be managed will lead to uneven and ineffective application of stormwater controls that will lead to compromised water quality and inability to effectively address diminished water quality values on all surface water in the County. It can be safely said that there are few high quality waters in the County. And, in fact, if sufficient water quality monitoring were undertaken on all surface waters in the County, most would end up being listed as impaired. Fragmenting application of the this proposed policy begs the question of how will Water Quality Standards be met, considering uneven and ineffective application of policy and actions, on impaired listed waters of the upper Russian River (above Mark West Creek – it is not clear as to the application on other Russian River tributaries in the lower river– Austin Creek, Green Valley Creek, Sheephouse Creek, etc. ), and the Gualala River (Both listed as impaired). And, what about Macaamas Creek, Dry Creek, Mill Creek (other tributaries of the Russian River) and Salmon Creek? Are these waters not impaired – and thus not needing nonpoint source stormwater controls to protect and recover their Beneficial Uses.

Finally, to fragment this policy and apply uneven and ineffective stormwater controls in selected areas of the County (that contain waters not meeting WQS), this policy would not be consistent with Coastal Zone Management Act mandates, Cal Water Code, and the Basin Plan (including Basin Plan Anti-degradation language). The proposed boundary must comply with CZMA, Basin Plan, Water Code, and TMDL (future project) mandates, prohibitions, and requirements.

If other programs are to be put in place to “offset” use of a limited and fragmented boundary, those programs should be so disclosed in their entirety (to comply with CEQA – as claimed by the wording in this project.)