

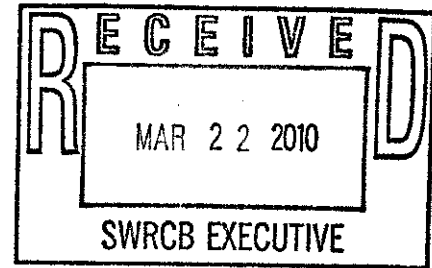


COUNTY OF SONOMA PERMIT AND RESOURCE MANAGEMENT DEPARTMENT

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March 22, 2010

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814



Subject: Comments on the Proposed Approval of an Amendment to the Basin Plan for the San Francisco Bay Region to Establish a TMDL for Sediment in Sonoma Creek and an Implementation Plan to Achieve the TMDL and Habitat Enhancement Goals.

Dear Ms. Townsend:

The County of Sonoma Permit and Resource Management Department (County) appreciates the opportunity to comment on the proposed Basin Plan Amendment (BPA). The County strongly supports efforts to protect and improve water quality and is currently implementing numerous compliance measures in our MS4 NPDES Storm Water permit. However, we have the following concerns with the TMDL and Implementation Plans:

Sediment Delivery to Sonoma Creek

The estimated Sediment Delivery in Table 2 of the proposed BPA includes roads and stream crossings but it is unclear what percentage of the roads assessed are County, State, or privately owned. Therefore, it is difficult to distinguish what percentage of County roads would be included in this category and if indeed those areas are a source of sediment input to Sonoma Creek.

The proposed BPA states on page 2 of the draft resolution, "In estimating costs, the Water Board has assumed that owners of agricultural businesses own 75 percent of total land area on hillside parcels, and 95 percent of the land along Sonoma Creek and lower reaches of its tributaries." Based on this assumption, the County's responsibility under the TMDL action plan would be minimal and should not be required to submit a WDR. As mentioned on page 2, "To demonstrate attainment of applicable allocations, responsible parties must demonstrate that they are in compliance with required implementation measures and any applicable waste discharge requirements (WDRs), WDR waiver conditions, or National Pollutant Discharge Elimination System permits."

In addition, Table 4.4 of the proposed BPA lists the Sonoma County Stormwater Management Program (SWMP) and County Transportation and Public Works as "Implementing Parties" and Table 4.5 lists compliance with our Municipal Stormwater Permit as the action for the County. As there seems to be a repetition of required action items in the implementation measures we believe that compliance with our

Municipal General Permit should be the mechanism by which we are required to implement best management practices to reduce road-related erosion in the watershed.

Implementation Plan

The proposed amendment mentions Adaptive Implementation for the TMDL. Please describe how public input will be a part of any changes to the sediment TMDL in Sonoma Creek.

Page 6 of the proposed BPA states, "The wasteload allocations contained in Table 3 apply to point sources of sediment that are regulated by NPDES permits. Table 4.5 shows implementation measures required of these sources, which include municipal stormwater." Please explain how the wasteload allocation was determined for point sources that are regulated under a Municipal NPDES Permit.

We appreciate the work of the Regional Board in addressing water quality issues in Sonoma County and look forward to continuing a cooperative and mutually beneficial relationship.

Sincerely,

Janice Gilligan
Storm Water Program Coordinator

Cc: Reg Cullen