



July 6, 2009

**Ms. Mona Dougherty  
Regional Water Quality Control Board  
5550 Skylane Boulevard, Suite A  
Santa Rosa, CA 95403**

SUBMITTED VIA E-MAIL to [mdougherty@waterboards.ca.gov](mailto:mdougherty@waterboards.ca.gov)

**Subject: Draft NPDES Phase I Permit Comments**

Dear Ms. Dougherty:

The Russian River Watershed Association (RRWA) is an association of local public agencies in the Russian River Watershed that have come together to coordinate regional programs for clean water, fisheries restoration, and watershed enhancement. We represent both Phase I and Phase II communities. Three of our member agencies – the City of Santa Rosa, the County of Sonoma and the Sonoma County Water Agency (the “co-permittees”) – are regulated by the Phase I permit.

The RRWA is committed to achieving a healthier watershed through implementing effective, regional programs. As such, we agree with the overall goals of the existing and revised permits and support the implementation of Low Impact Development, public education, inspections, and enforcement to achieve improved water quality.

RRWA appreciates the efforts that the Regional Board has made in revising the text of the draft Phase I permit since the release of the original draft in the fall of 2008. In spite of the revisions, RRWA still feels that the permit as written will place unnecessary financial and administrative burdens on the co-permittees without commensurate improvements in water quality and overall watershed health.

Additionally, as noted in comments to be submitted by the City of Santa Rosa, there may be provisions in the permit that are inappropriate from a legal/regulatory point-of-view including the Receiving Water Limitation language and the inclusion of the 1995 Waste Reduction Strategy for the Laguna de Santa Rosa. RRWA respectfully requests that the Regional Board consider further revisions to the draft Phase I permit that address the stated concerns of the co-permittees.

RRWA looks forward to describing these concerns in further detail at the upcoming public meetings currently scheduled to occur on July 22-

**MEMBER AGENCIES**

- City of Cloverdale
- City of Cotati
- City of Healdsburg
- City of Rohnert Park
- City of Santa Rosa
- City of Ukiah
- County of Sonoma
- Sonoma County Water Agency
- Town of Windsor

**DAVE RICHARDSON**  
Executive Director

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23 and October 1st. Because the allowed review period for the revised draft permit and response to comments was short, RRWA did not have time to put together a robust comment letter by the July 6<sup>th</sup> deadline. As such, RRWA plans to use the next couple weeks to consolidate the common concerns of our Phase I agencies (Santa Rosa, Sonoma County, and Sonoma County Water Agency) as well input from our Phase II communities (Cloverdale, Cotati, Healdsburg, Rohnert Park, Windsor, and Ukiah) for presentation at July 22-23 meeting. RRWA will be represented at the July 22-23 meeting by Jake Mackenzie, Chair of RRWA's Board of Directors, or Phoebe Grow, RRWA Assistant Executive Director.

Sincerely,

A handwritten signature in black ink that reads "David L. Richardson". The signature is fluid and cursive, with "David" on top, "L." in the middle, and "Richardson" on the bottom line.

Dave Richardson, RRWA Executive Director  
Russian River Watershed Association, [www.rrwatershed.org](http://www.rrwatershed.org)