



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
- Mendocino County Water Agency
- Mendocino County Inland Water and Power Commission
- Sonoma County Water Agency
- Town of Windsor

DAVE RICHARDSON
Executive Director

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Planned oral comments by RRWA regarding the Draft Phase I Permit - North Coast RWQCB meeting, July 22, 2009.

SCRIPT:

Good morning Chairman Anderson (...vice chair Hales) and members of the Board. Thank you for this opportunity to comment. I am Phoebe Grow representing Russian River Watershed Association, a collaborative organization of local public agencies in the Russian River Watershed. Our member agencies include the City of Santa Rosa, the County of Sonoma, the Sonoma County Water Agency, as well as the cities of Cloverdale, Cotati, Healdsburg, Rohnert Park, Ukiah and the Town of Windsor.

RRWA is committed to achieving a healthier watershed by implementing effective regional programs. As such, we agree with the overall goals of the existing and draft permits. RRWA appreciates the efforts that the Regional Board has made in revising the draft Phase I permit. In spite of the revisions, RRWA still feels, however, that there are significant problems with the permit.

As currently written, the permit would place undue financial and administrative burdens on the co-permittees without providing commensurate water quality benefits to our region. Even in the best economic times, the very significant new costs associated with implementing the permit would be difficult for the co-permittees to absorb. With the current state of the economy, these financial burdens are even more onerous. I will take a quick moment here to highlight a couple examples:

- As noted in written comments submitted by the City of Santa Rosa, the draft permit requires mapping all existing connections to the storm drain system. This would require the City to videotape over 300 miles of storm drain at an estimated cost of approximately \$4.7M. These staggering costs cannot be justified by the minimal, indirect environmental benefits that might result from this exercise.
- As discussed in written comments submitted by Sonoma County, the draft permit would require the County to take on an entirely new suite of inspections for industrial and commercial facilities. The County does not have the training, resources, or staff to implement this program and we are concerned that these inspection requirements are in fact an unfunded local mandate.

In addition to these and other unnecessarily severe financial burdens, many timeframes in the Draft Permit are unrealistic and unreasonable. Furthermore, RRWA feels that the draft permit as written does not sufficiently acknowledge the going efforts of the co-permittees and does not adequately consider conditions particular to our region. The draft

Permit also lacks clarity regarding which provisions are applicable to each permittee.

Finally, RRWA objects to the inappropriate inclusion of the 1995 Waste Reduction Strategy for the Laguna de Santa Rosa. The Waste Reduction Strategy is not a valid TMDL. Detailed comments regarding this matter have been submitted by the City of Santa Rosa and the County of Sonoma.

In conclusion, this is not the time for these costly and sometimes unworkable provisions. This is the time to take stock of the advances that have been made while prioritizing with the communities where existing resources should be spent. As such, RRWA respectfully requests that the Regional Board consider further revisions to the draft Phase I permit that address the concerns I have outlined today and the other stated concerns of the co-permittees.