
(Name: Please Print)

(Street Address)

(Town)

(Zip Code)

August, 2013

North Coast Regional Water Quality Control Board
Matthias St. John: Executive Officer
5550 Skylane Blvd. Suite A
Santa Rosa, CA 95403
Email: mstjohn@waterboards.ca.gov

Dear Mr. St. John and Regional Board Members:

I wish to express my concern about a few important aspects of the *Revised Waste Discharge Requirements and Water Reclamation Permit for the City of Santa Rosa's Subregional Water Reclamation System*. I realize the comment period is past, but I only recently learned about this permit. I'm hoping these comments can be relayed to the Regional Board for the August 22, 2013 meeting.

I support the comments of Russian River Watershed Protection Committee (RRWPC). Some of the concerns expressed by RRWPC and others and with which I agree are:

- Irrigation runoff from many urban and some rural sites appears to be under-reported. Repetitive events are common (as indicated in RRWPC comments), and demonstrates that the runoff is more of an illegal discharge than an occasional, incidental, accidental occurrence as described in Basin Plan and Recycled Water Policy. No monitoring is required for endocrine disrupting chemicals even where the runoff occurs on landscapes utilizing pesticides, herbicides, etc. This illegal runoff goes into degraded, low flowing streams in violation of *anti-degradation* and *no-backsliding* regulations and requirements.
- While we believe the permit's reclamation requirements are extensive, frequent monitoring should be required to assure compliance, and strong enforcement mechanisms are needed to assure that compliance will really be enforced.
- Mercury in fish and sediments needs to be monitored in both the Russian River and Laguna since a State wide study indicated that fish in the Laguna have very high levels of that extremely toxic substance. Fishermen should be notified where risk is very high.
- Contrary to Santa Rosa's requests, please do not back slide and change limit of No Net Discharge of Phosphorus into the Laguna. This nutrient is the main cause of extensive nutrient pollution in the Russian River and Laguna. For 35 years, Santa Rosa historically discharged billions of gallons of treated wastewater into the Laguna, much of which may have settled into sediments and may be affecting nutrient pollution in the present time.
- Similarly, I believe No Net Discharge of Nitrogen should be retained from the last permit, at least until Total Daily Maximum Loads are determined per Clean Water Act.

Sincerely,

(Signature)

(Date)