

RRWPC

Russian River Watershed Protection Committee

Post Office Box 501
Guerneville, CA 95446
(707) 869-0410

N C R W Q C B

SEP 28 2009

Bill Rodriquez
Enforcement Division
North Coast Regional Water Quality Control Board
5550 Skylane Blvd. Ste. A
Santa Rosa, CA 95403

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<input type="checkbox"/> AEO	<input type="checkbox"/> Timber	<input type="checkbox"/> Legal
<input checked="" type="checkbox"/> Reg/NPS <i>WTR</i>	<input type="checkbox"/> Cleanups	<input type="checkbox"/> Date

September 28, 2009

Dear Bill:

I would like to file a formal complaint on behalf of Russian River Watershed Protection Committee concerning what I believe to be Rohnert Park and Santa Rosa violations of Santa Rosa's NPDES Permit #R1-2006-0045, NPDES #CA0022764.

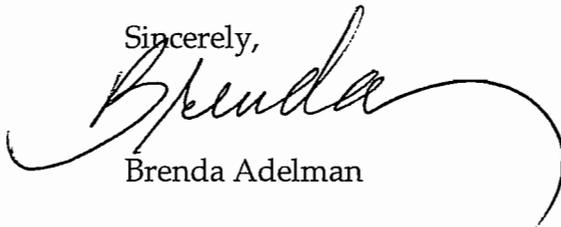
Part of the Permit includes Water Reclamation Requirements and Provisions which, I believe have been violated. I submit a packet of pictures of over-irrigation with wastewater in Rohnert Park with this letter. I also include some pictures of over-irrigation with potable water as well. While I do not believe that over-irrigation with potable water is officially a violation as yet, it likely will be soon and it supports our idea that over-irrigation is a common occurrence.

The enclosed pictures are clearly identified and described. Most of the photos have file numbers and dates. Pictures taken by Dawna Gallagher do not have the date on the photos. We have identified when and where her pictures were taken however, and hope that will be adequate.

In reading the very short Water Reclamation Requirements and Provisions, it is clear that RP appears to have violated numerous Requirements, including numbers 1-6 for sure and possibly some of the others as well.

I don't know your process for this; I have never formally reported a violation before. Please contact me when you receive this and let me know if there is anything else I need to do. Also, I would like to be kept informed of your assessment of this issue.

Sincerely,



Brenda Adelman

RRWPC

Russian River Watershed Protection Committee

NCRW

SEP 28 2009

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Guerneville, CA 95446

(707) 869-0410

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Notes on photographs:

Most were taken by me in August, 2009. The Ludwigia photos were taken from the Stony Point Bridge, just south of the Rohnert Park Expressway. The two views that are similar were taken in 2008 and 2009. The main apparent difference is that the Ludwigia is now higher. The heavy Ludwigia growth is at least partially a result of irrigation runoff from Rohnert Park. The growth had been cleared a few years back, but not maintained, and it came back thicker than ever. And there it stays, getting worse each year. (Other locations, especially in Bellevue-Wilfred Channel have invasions that are just as thick.)

The other photos were all taken in Rohnert Park (RP) on three different occasions, starting at 7 AM. I photographed properties where there was standing water, but damp pavement was noted in many areas. We have since learned that many sites irrigate in the middle of the night (or at least much earlier than 7 AM, so it is likely that there is much more over irrigation than I documented. I have file numbers and dates on each photo. Except for one case, where pictures were taken at the RP Community Center, I have taken a picture of the address and/or name of the development, so the exact location can be determined. The pictures at 6160 Country Club Drive showed runoff that was actually from the median strip in front of that address.

The "Windmill Farms" site was about the worst. It also had sediment running off. The man at the property next door told me that the water had been running the entire prior day. We saw a lot of damp pavement at the Robert's Lake site, but didn't include the pictures because it's mostly damp pavement. We do know that that site, the golf course, the parks and the schools all use wastewater. RP irrigates about one half billion gallons a year, but we have no way of know how much runs off. They have a 17 year old contract with the City of Santa Rosa, and the Regional Board conducts no over site on irrigation. They rely on self-reporting. There have been only a few reports of Rohnert Park over irrigation by the City of Santa Rosa, and that was when someone called up and complained. There doesn't seem to be any other oversight.

We are not certain which sites are using water and which, wastewater, but runoff should be forbidden in either case. The wastewater is not supposed to run off into drainages, but in every case where runoff occurred, this is exactly what happened.

As for Santa Rosa, in a August 4, 2009 memorandum, Greg Scoles reports in a "Water Conservation Update", that City of Santa Rosa patrols have identified 40 incidents of over irrigation City wide per week. That is a very significant amount. As yet, we have not attempted to photograph irrigation over flows in Santa Rosa.

Brenda Adelman/Sept. 28, 2009

Photo Packet

Rohnert Park Over-Irrigation

Assembled by Brenda Adelman /Sept. 28,2009

Photos by Brenda Adelman and Dawna Gallagher

All pictures with file numbers & dates taken by Brenda Adelman in August, 2009
Others taken by D. Gallagher

1. Photos from the Laguna Foundation's Final Report on the Ludwigia Removal Project published in early, 2008.
2. Pictures taken of Bellevue-Wilfred Channel from Stony Point Bridge looking east in August, 2008, (upper right) and August, 2009 (other three). Other parts of the channel are similarly filled with Ludwigia. It appeared as though the invasive plant grew higher between 2008 and 2009.
3. This golf club is owned by Rohnert Park and irrigated with wastewater. Just as I drove up the sprinklers turned off (by coincidence). There was runoff all along the sidewalk where the watering had occurred. It was also running off along Golf Course Dr. Pictures were taken 8-2-09. Notice how very green and lush the lawn is.
4. These pictures were taken at the Rohnert Park Community Center at RP Expressway and Snyder Lane. There were no sprinklers going in the area of the runoff when I got there, but it is easy to see all the pooled wastewater on the street, along the curbs, and heading to the drains. Pictures were taken Aug. 10, 2009.
5. These pictures were taken at Sunrise Park on Snyder Lane near the Rohnert Park Expressway. They irrigate with wastewater. Pictures were taken Aug. 19, 2009. You can see water coming from two irrigated areas and into the drain. There was no irrigation going on when I was there.
6. These pictures were taken at Mountain Shadows Middle School on Aug. 19, 2009. They irrigate with wastewater. There is clear ponding on the street.
7. These pictures were taken by Dawna Gallagher in mid-August, 2009, on Country Club Dr. at Golf Course Dr. across the street from the fire station. This irrigation is with treated wastewater.
8. These pictures were taken by Dawna Gallagher on Aug. 14, 2009. The bottom two pictures were at Mountain Shadows Golf Course by Coddling Enterprises where they use wastewater. The top two pictures were taken at the Rancho

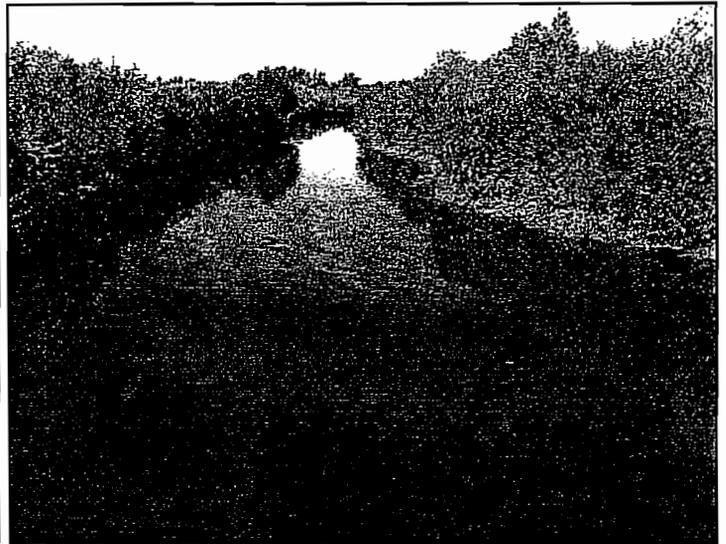
Grande Mobile Home Park on Rohnert Park Expressway near Stony Point. I think they are using potable water here. I went there myself and got pictures on another day and saw the same runoff, although most of the sprinklers were off when I got there. I have numerous pictures of the same area with dates & file numbers on the photos. (I think these are the same as my pictures of Rancho VERDE in #11. Dawna may have made a mistake on the name, but it looks like the same place.

9. These pictures were taken by me right by Rohnert Park Expressway and Country Club Dr. on Aug. 10, 2009. I got the address in the picture for identification only, but the spray seemed to have come from watering in the center street divider. I don't know if they use wastewater here, but there was quite a bit of runoff. Dawna noted similar runoff on a different day when she went by there.
10. These were taken at a small business park on the east side of Snyder Lane near Rohnert Park Expressway on Aug. 19, 2009. (I think it was across from Sunrise Park.) I don't think it was wastewater, but there was quite a bit of runoff all over the place.
11. Here are other pictures of Rancho Verde Mobile Home Park on Rohnert Park Expressway near Stony Point taken on 8-19-09. I think this is potable water, but they sure use a lot of it. This is not far from the Bellevue-Wilfred Channel. Everything looked so deeply green, that they probably use a lot of soil amendments. It was a very long area that was over-watered (like a city block).
12. These pictures were taken on Redwood Dr. right by the turn into Rohnert Park Costco. I think this was potable water. There wasn't much grass to water, but they were soaking it pretty good. Also, their lawn was VERY bright green. These were taken Aug. 19, 2009.
13. The last set was taken on Aug. 19, 2009 on E. Cotati Ave. This was the property that had the water going the whole day previously. I'm fairly certain that this is potable water. The lower right photo shows sediments running into the sidewalk from the driveway. It was clear that this parcel (mobile home park) was super saturated.
14. The list of irrigators may be slightly out of date. Also, I didn't include the Press Democrat property in Rohnert Park, which had irrigated with wastewater for a very long time, because they stopped watering and let their lawn turn brown. They put a big sign up saying something like, "Conservation is beautiful". Apparently they had been getting a lot of complaints from their readers for having this huge lawn.

Laguna Main Channel, SCWA Field Site: Photo Point I-13



Pre-spray
July 2005



Post-removal
October 2005



Pre-spray
June 2006

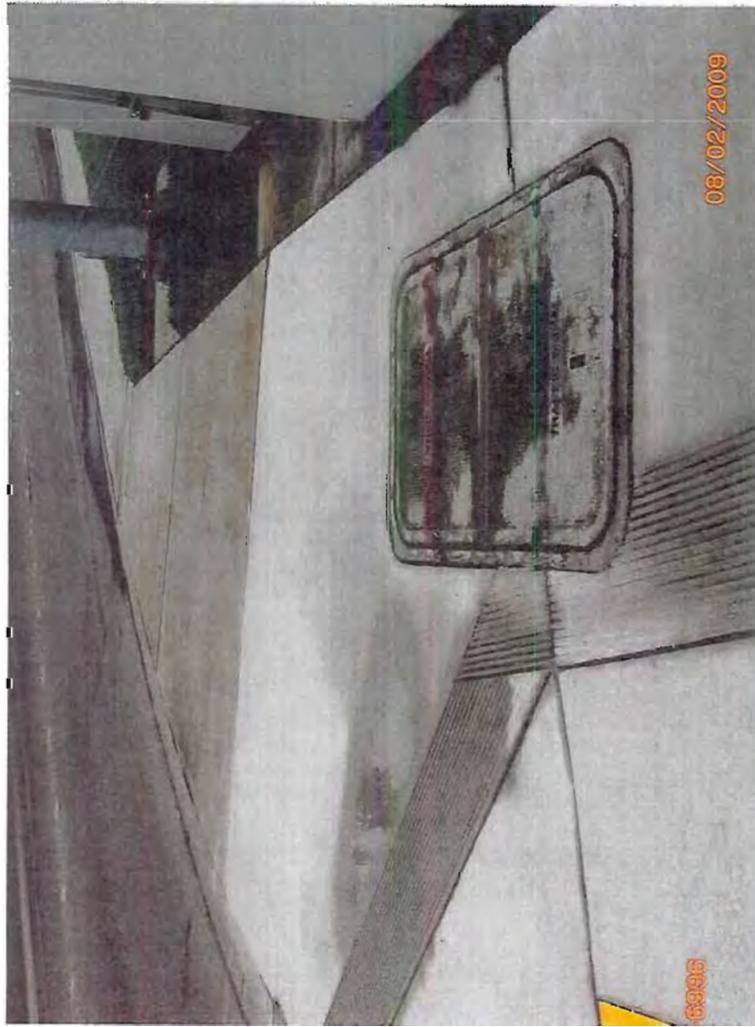
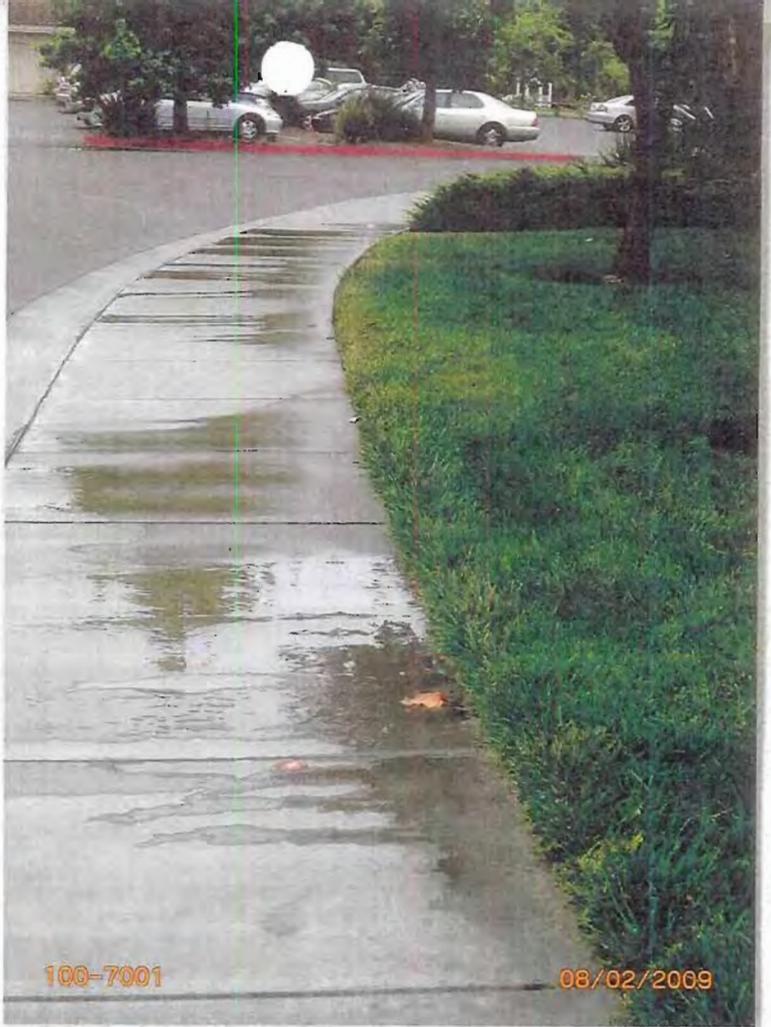


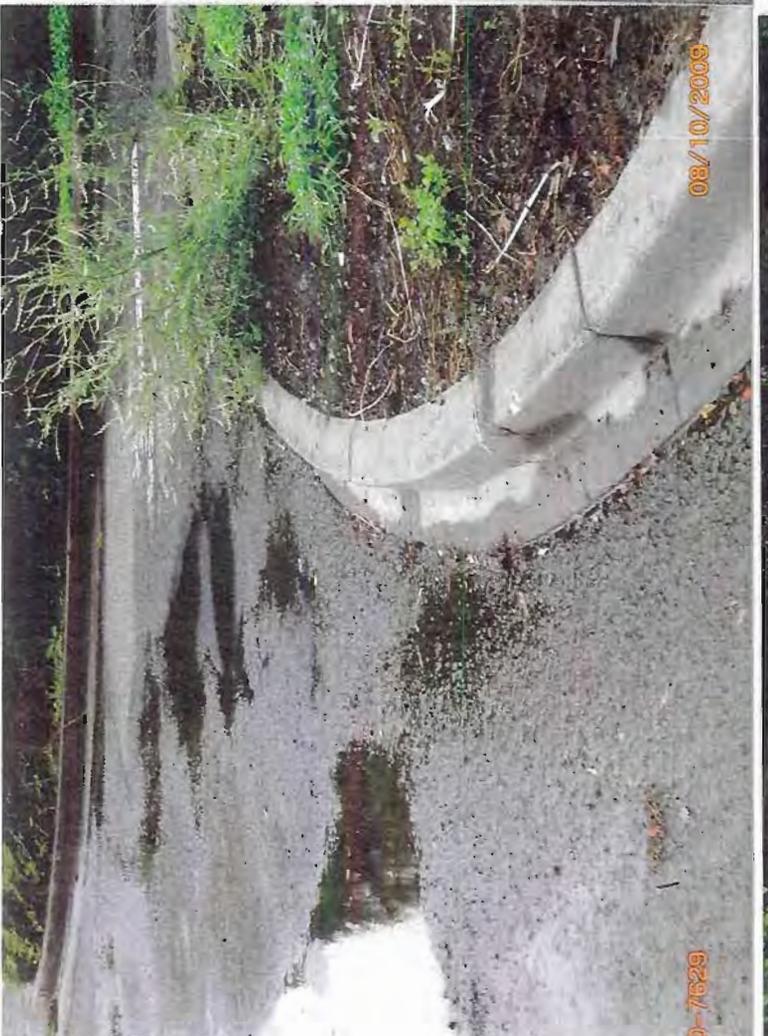
Post-spray
September 2007

Main Laguna channel looking west from the Stony Point Road Bridge. Prior to project activities this relatively deep section was heavily infested. Following the first year of spray/removal the channel was largely clear and remained so in June 2006. No removal occurred in 2006. The drought of 2006/2007 resulted in shallow conditions in spring/summer 2007 allowing *Ludwigia* to root mid-channel. Despite two herbicide applications, the channel experienced significant regrowth in 2007 as well as large algal blooms. A low flow channel to contain summer flow would limit the area of the channel available for colonization.

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100-8190



100-8178



08/19/2009

0-8181



08/19/2009

0-8184

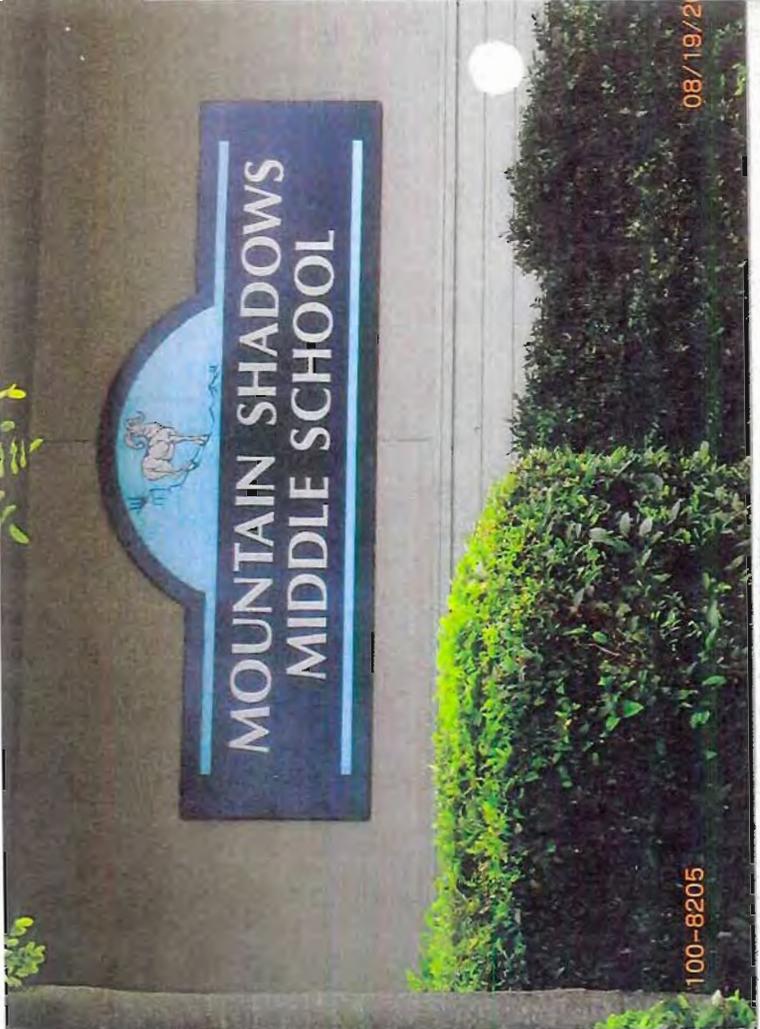
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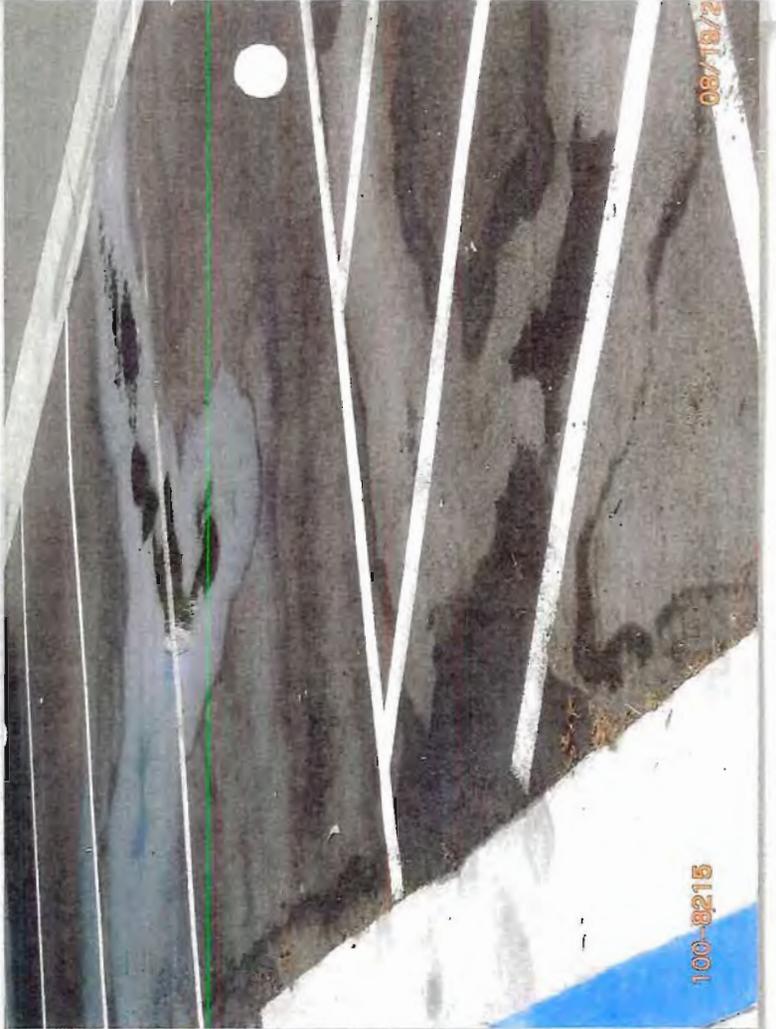
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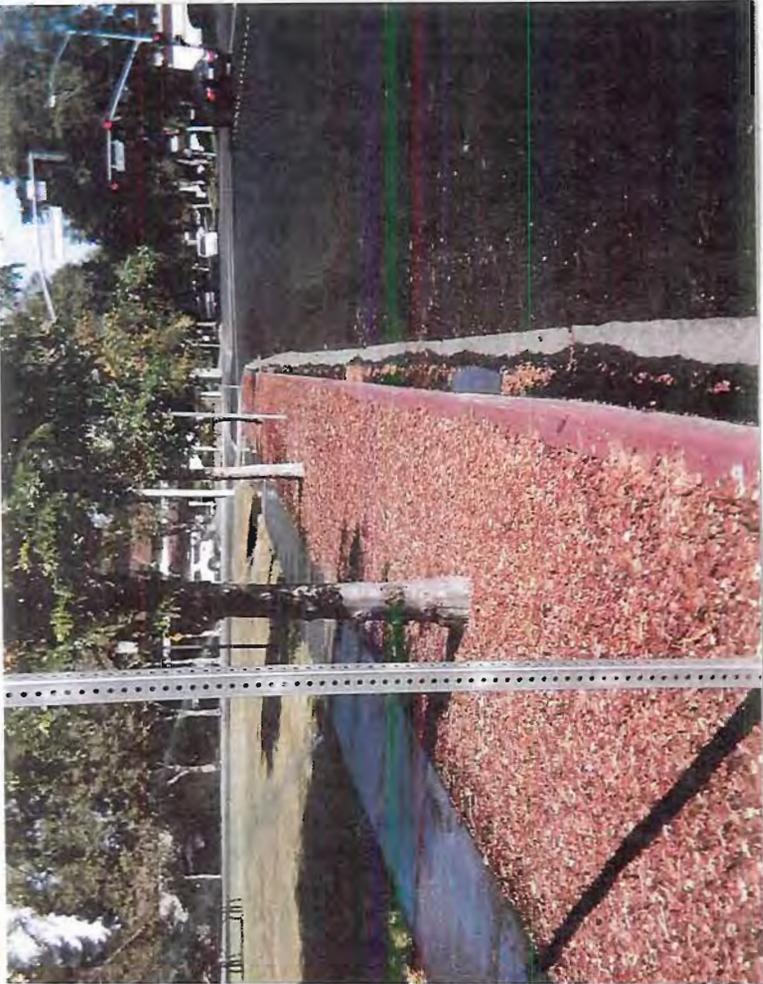
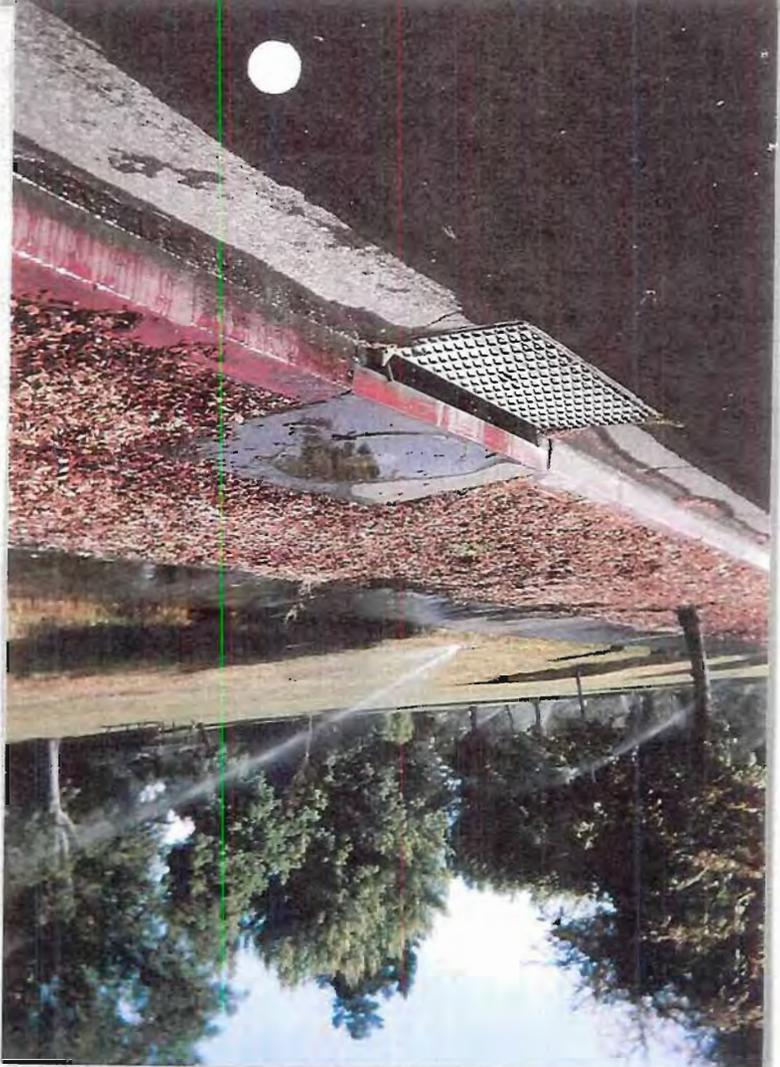
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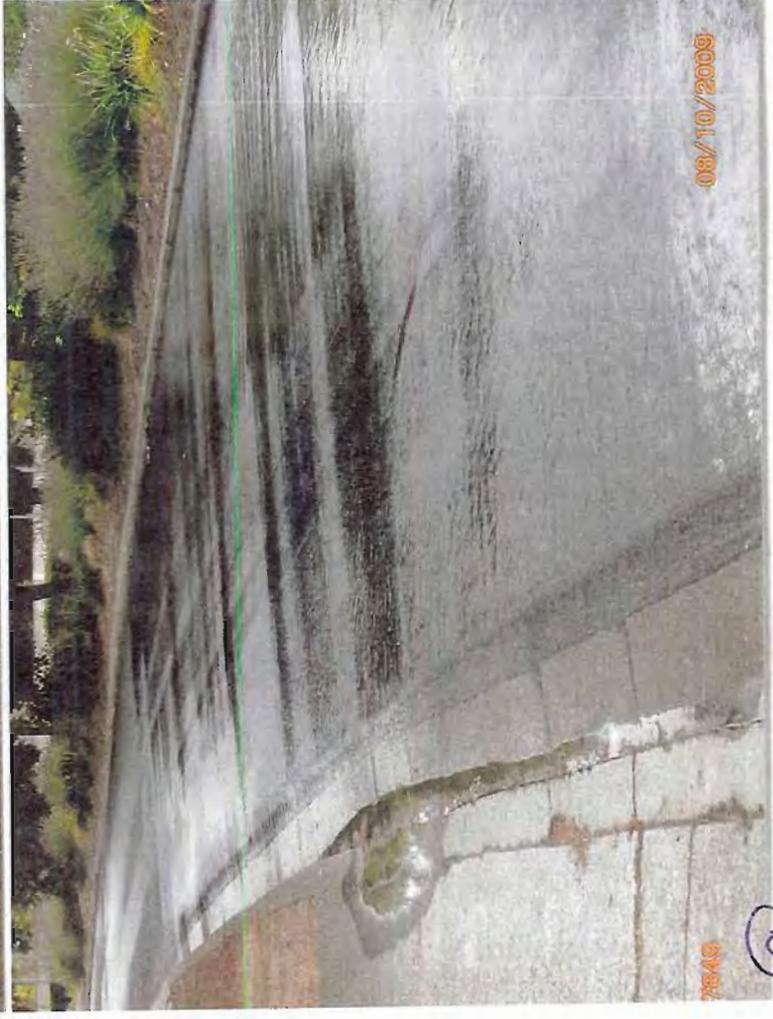
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6/25/2016 6:11 AM



PEDIATRIC DENTISTRY

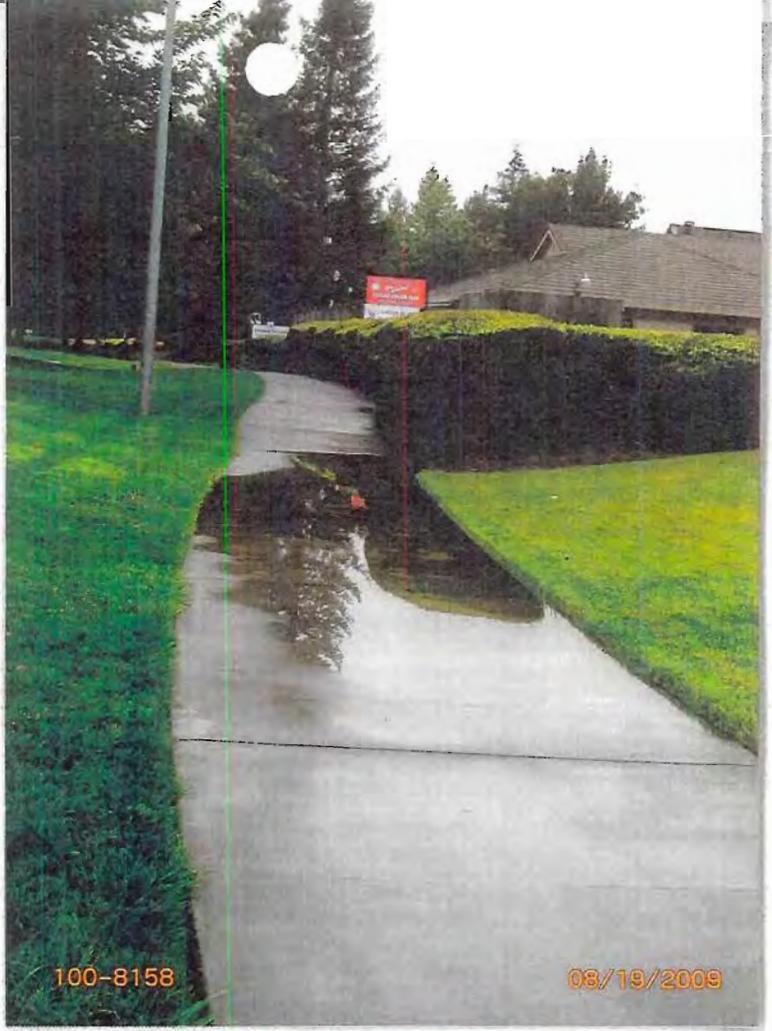
Jenise Briggs, D.D.S.

(707) 584-3718



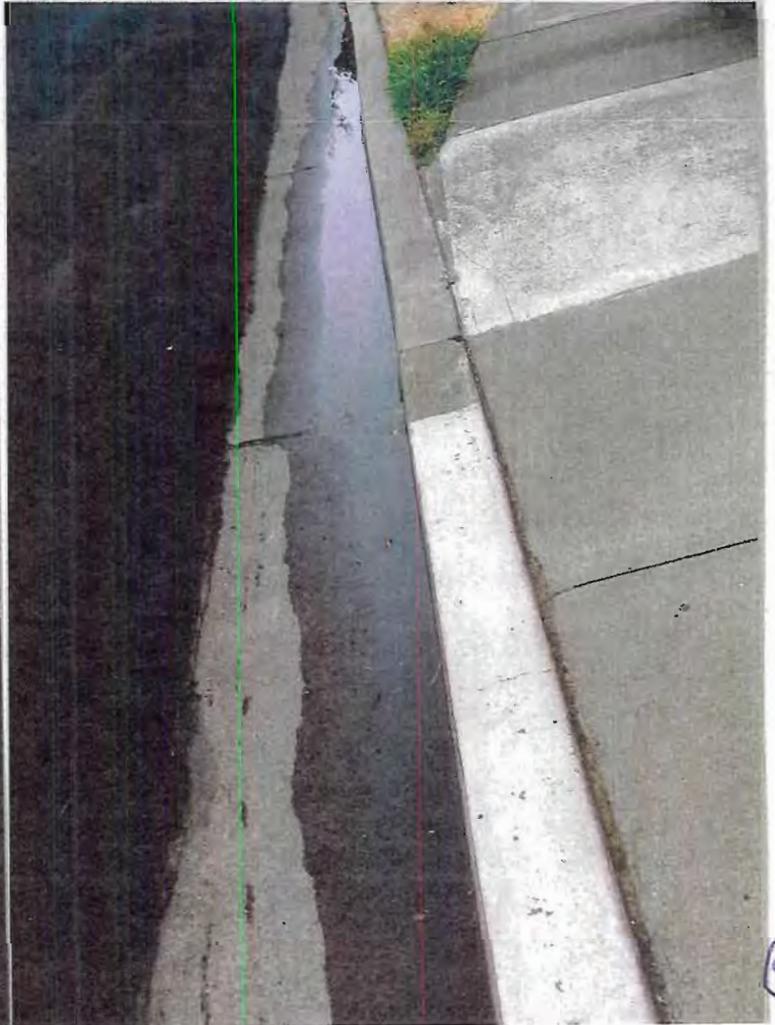
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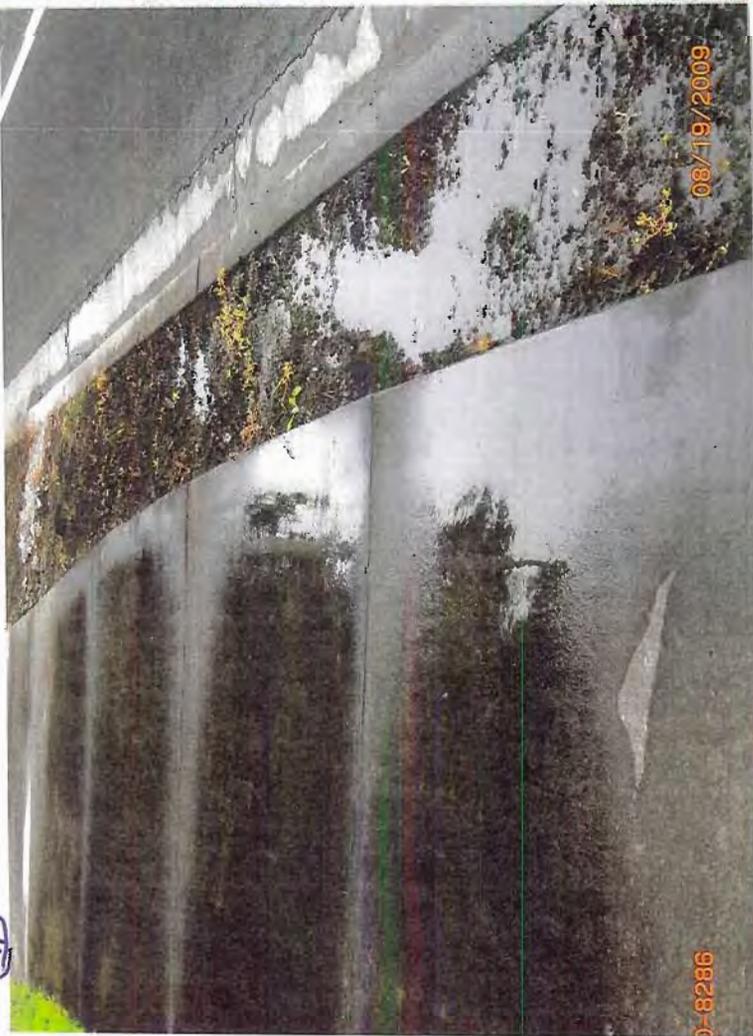
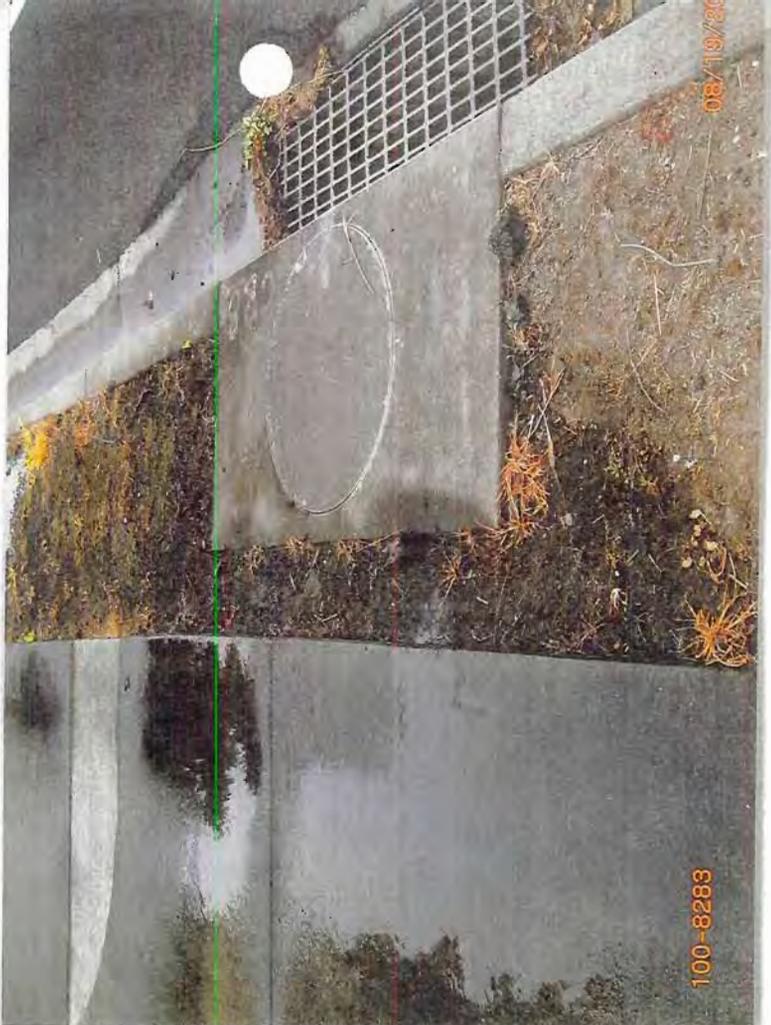


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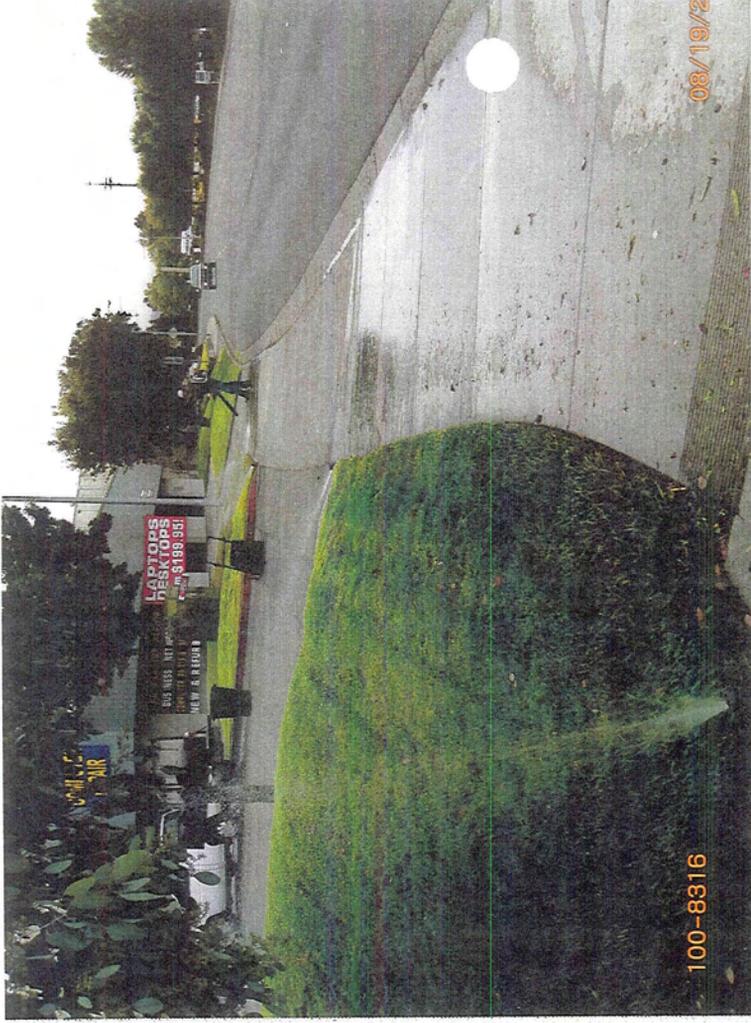


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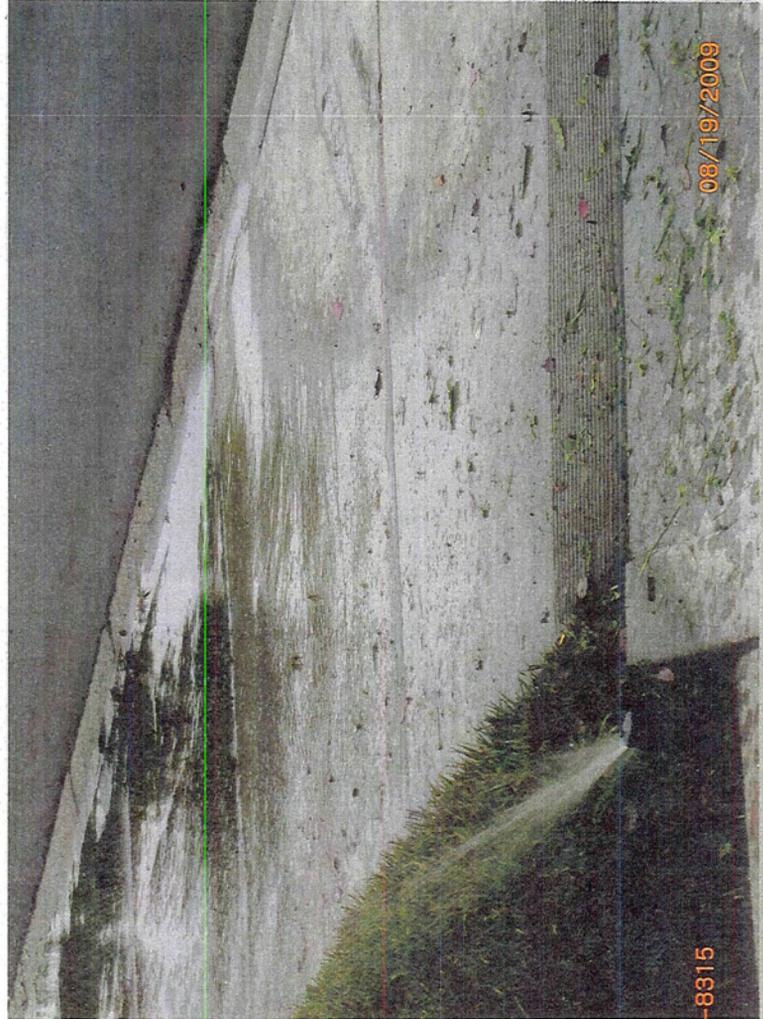
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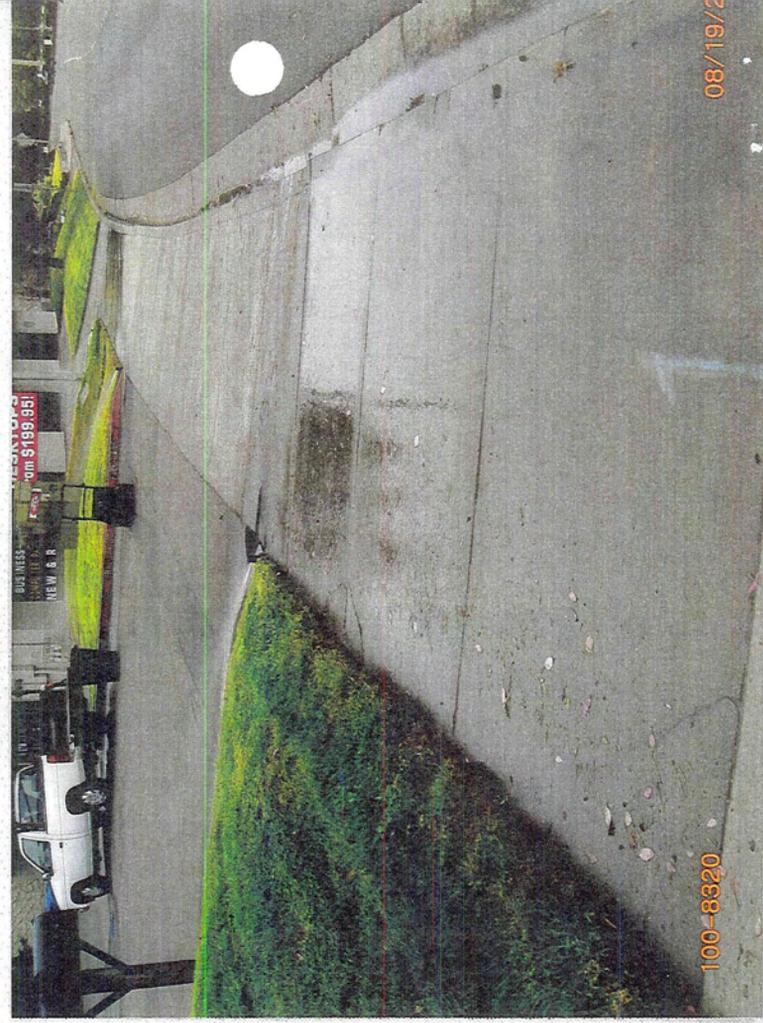
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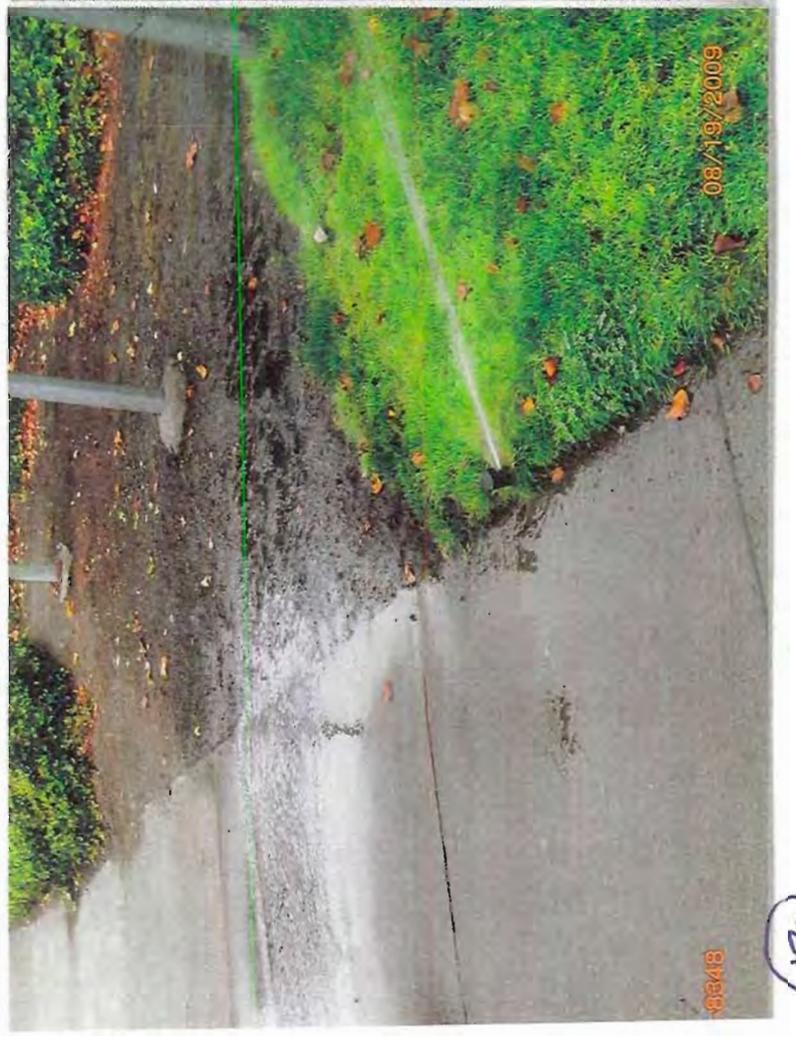
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08/19/2009



100-8320

08/19/2009



14) List of Rohnert Park Irrigators - list may be incomplete
(wastewater)

Code *# First Name Last Name Str.Address City/State Zip 2001 2002

RP/4	9-09	Agilent	Agilent Technologies	1212 Valley House Dr.	Rohnert Park, CA	94928
RP/4	9-09	City of Rohnert Park	Alicia Park	300 Arlen Rd.	Rohnert Park, CA	94928
RP/4	9-09	City of Rohnert Park	Benicia Park	7450 Santa Barbara Way	Rohnert Park, CA	94928
RP/4	9-09	City of Rohnert Park	Codding Enterprises	1400 Valley House Dr.	Rohnert Park, CA	94928
RP/4	9-09	City of Rohnert Park	Colegio Vista Park	1150 Southwest Blvd.	Rohnert Park, CA	94928
RP/4	9-09	City of Rohnert Park	Community Center	5401 Snyder Lane	Rohnert Park, CA	94928
RP/4	9-09	Louis Zanardi	Compumotor	5500 Business Park Dr.	Rohnert Park, CA	94928
RP/4	9-09	Cotati-RP School Dist.	Creekside Middle School	5154 Snyder Lane	Rohnert Park, CA	94928
RP/4	9-09	City of Rohnert Park	Dorotea Park	901 Santa Dorotea Circle	Rohnert Park, CA	94928
RP/4	9-09	City of Rohnert Park	Eagle Park	1105 Emily Ave.	Rohnert Park, CA	94928
RP/4	9-09	Cotati-RP School Dist.	El Camino School	5860 Labath	Rohnert Park, CA	94928
RP/4	9-09	Cotati-RP School Dist.	Evergreen School	1125 Emily Ave.	Rohnert Park, CA	94928
RP/4	9-09	City of Rohnert Park	Foxtail Golf Course	100 Golf Course Dr.	Rohnert Park, CA	94928
RP/4	9-09	Rogers Realty	Fresh Choice	5080 Redwood Dr.	Rohnert Park, CA	94928
RP/4	9-09	Cotati-RP School Dist.	J. Reed School	390 Arlen Dr.	Rohnert Park, CA	94928
RP/4	9-09	City of Sebastopol	Laguna Park	390 Morris St.	Sebastopol, CA	95472
RP/4	9-09	City of Rohnert Park	Magnolia Park	1401 Middlebrook Way	Rohnert Park, CA	94928
RP/4	9-09	Cotati-RP School Dist.	Monte Vista School	1400 Magnolia	Rohnert Park, CA	94928
RP/4	9-09	Cotati-RP School Dist.	Mountain Shadow School	7165 Burton Ave.	Rohnert Park, CA	94928
RP/4	9-09	City of Rohnert Park	Mountain Shadows Apartments	160 Golf Course Dr.	Rohnert Park, CA	94928
RP/4	9-09	City of Rohnert Park	Public Safety Dept.		Rohnert Park, CA	94928
RP/4	9-09	Cotati-RP School Dist.	R. Crane School	1290 Southwest Blvd.	Rohnert Park, CA	94928
RP/4	9-09	City of Rohnert Park	Rainbow Park	1345 Rosana Way	Rohnert Park, CA	94928
RP/4	9-09	Cotati RP School Dist.	Rancho Cotati H.S.	5450 Snyder Lane	Rohnert Park, CA	94928
RP/4	9-09	Greg Pilgrim	Redwood Creek Apartments	600 Rohnert Park Exprwy. West	Rohnert Park, CA	94928
RP/4	9-09		Roberts Lake	Roberts Lake Rd.	Rohnert Park, CA	94928
RP/4	9-09		Rogers Realty	101 Golf Course Dr. Ste. 300	Rohnert Park, CA	94928
RP/4	9-09		Rohnert Park Stadium	5900 Labath	Rohnert Park, CA	94928
RP/4	9-09		Shurgard Storage	6635 Redwood Dr.	Rohnert Park, CA	94928
RP/4	9-09	Rick Randall	Son.County Golf Learning Cent.	1475 W. Sierra Ave.	Rohnert Park, CA	94928
RP/4	9-09	Facilities Services	Sonoma State University	1801 E. Cotati Ave.	Cotati, CA	94931
RP/4	9-09	Jerry Sullivan	State Farm Insurance	6400 State Farm Dr.	Rohnert Park, CA	94928
RP/4	9-09	City of Rohnert Park	Sunrise Park	5201 Snyder Lane	Rohnert Park, CA	94928
RP/4	9-09	Cotati-RP School Dist.	Waldo Rohnert School	550 Bonnie Ave.	Rohnert Park, CA	94928