NCRWQCB

JAN 28 2009

January 27, 2009

☑ EO ☐ WMgmt HAL ☐ Admin
☐ AEO ☐ Timber ☐ Legal
☑ Reg/NPS MW ☐ Cleanups ☐
☐ Date

Catherine Kuhlman, Executive Officer
North Coast Regional Water Quality Control Board
5550 Skylane Blvd. Ste. A
Santa Rosa, CA 95403

Dear Ms Kuhlman:
I am writing concerning the proposed Basin Plan amendment entitled:

Water Quality Control Plan for the North Coast Region to establish exception criteria to the Point Source Waste Discharge Prohibitions By Revising the Action Plan for Storm Water Discharges and adding a new action Plan For Low Threat Discharges.

As a property owner concerned about the environment and clean water, I am aware of the possibility of unregulated chemicals being released during winter rain conditions especially. Therefore, I support your efforts to ameliorate conditions that speed the flow of pollutants into our waterways.

Secondly, this proposed amendment addresses situations that may occur any time of year, where a planned discharge is necessary for an activity that serves the public benefit and is determined to be of low threat to the environment. This includes well and public

infrastructure testing, construction dewatering, and similar types of point source discharges that are considered a low threat to water quality, yet must be regulated.

It is the third proposal that causes great concern, and includes allowing non storm water runoff and/or "incidental" runoff defined as "incidental discharges that are unanticipated, accidental and infrequent." Originally this was going to be dealt with as a separate Basin Plan Amendment, but now relies on future implementation of Best Management Practices that have yet to be developed. Because these discharges have the potential for great harm, I am requesting that you remove this part of the amendment until the "BMPs" to protect water quality can be further examined

Yours very truly,

Leo Smith