

Russian River Watershed Association
Oral Comments made by Virginia Porter on SR NPDES permit
November 21, 2013

Good morning Chair Noren and members of the Board. I am Virginia Porter, Executive Director of the Russian River Watershed Association. I am here today representing our 11 member agencies in the Russian River Watershed - with our recent additions of Sebastopol and the County of Mendocino we now have every incorporated city and both counties as members. Our comments today are on behalf of all of our member agencies.

RRWA supports the comments made today by the City of Santa Rosa - the concerns they have articulated are shared by RRWA member agencies. Santa Rosa is an effective steward of their wastewater treatment and recycling system, and we know Santa Rosa will continue to be an environmentally responsible steward. Their commitment is evidenced by their actions - including their unprecedented investment in reducing discharge with the innovative Geysers project; and their current commitment to the offset program. Santa Rosa often sees solutions that take us all by surprise.

I have a few specific comments on the proposed Order relating to the recycled water requirements. These requirements are important to RRWA - nearly all our member agencies manage and operate wastewater treatment and disposal systems, and most either have or plan to have recycled water as part of their community's water supply mix.

The State Water Code declares that "use of potable domestic water for non-potable uses.... is a waste or unreasonable use of water if recycled water is available..." [California Water Code section 13550(a)]. We need a regulatory framework that supports this important mandate.

We need a regulatory framework that supports the goal of safe and efficient use of this resource.

Santa Rosa's recycled water program has an excellent track record dating back to 1989 - with no identified issues resulting from recycled water use. The requirement in the proposed Order to report on maintenance records in private facilities for both existing and future recycled water sites is excessively burdensome without an identifiable benefit; it would likely be considered a compelling reason for our members not to develop recycled water to utilize this valuable resource. We have additional concern that burdens to existing recycled water users could result in a loss of the customer base which could hamper regional efforts.

We understand that the City of Santa Rosa is asking the Regional Board to separate out the requirements of Recycled Water Use from the wastewater NPDES permit. RRWA agrees with Santa Rosa and supports their request; we agree this is a more workable structure.

We appreciate the opportunity to comment.