



December 3, 2012

**Mr. Matthias St. John, Executive Officer**  
**California Regional Water Quality Control Board**  
**North Coast Region**  
**5550 Skylane Boulevard, Suite A**  
**Santa Rosa, CA 95403**

**Subject: Russian River Watershed Association comments regarding draft Order # R1-2013-0001 - *Waste Discharge Requirements and Master Reclamation Permit for the Santa Rosa Subregional Water Reclamation System***

**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
- Sonoma County Water Agency
- Town of Windsor

Dear Mr. St. John:

This letter presents comments from the Russian River Watershed Association (RRWA) on the Regional Water Quality Control Board's ("Regional Board") draft Order # R1-2013-0001: *Waste Discharge Requirements and Master Reclamation Permit for the Santa Rosa Subregional Water Reclamation System* (Draft Order). RRWA's nine members are all public agencies in the Russian River watershed in Sonoma and Mendocino Counties that have come together to coordinate regional programs for clean water and watershed enhancement. We appreciate the opportunity to comment on this Draft Order which has implications for all of our member agencies.

**VIRGINIA PORTER**  
Executive Director

300 Seminary Avenue  
Ukiah, CA 95482  
(707) 833-2553

Our comments on the Draft Order focus on the new reclamation monitoring and reporting requirements. Nearly all our member agencies manage and operate wastewater treatment and disposal systems, and most either have or plan to have recycled water delivery systems for the beneficial reuse of treated wastewater. Our region is counting on recycled water as a source of water supply now and in the future, and we need a regulatory framework that supports this goal.

The Draft Order contains numerous new recycled water requirements that seem to be taken directly from the State's General Permit for Landscape Irrigation (Landscape General Permit). The Landscape General Permit is very restrictive because it was written for situations with no knowledge of the conditions surrounding the use of recycled water. The City of Santa Rosa's recycled water program has an excellent track record with no identified ground water or surface water issues resulting from recycled water use. In particular, Santa Rosa's recycled water has been used in the urban sector in the City of Rohnert Park since 1989. Today the Santa Rosa Subregional System's recycled water constitutes approximately 13 percent of Rohnert Park's total water supply. Approximately 475 acres of land are irrigated with an average of 1,000 acre-feet of recycled water a year in Rohnert Park, including 10 City parks, 2 City-owned 18-hole golf courses, 10 school sites, and several commercial sites. Prior to the recycled water system installation these sites used groundwater or the municipal water supply for irrigation needs. At present, these large irrigators no longer need to draw groundwater. The recycled water system provides potable offset benefits and reduces demand upon the Sonoma County Water Agency

supply and the local groundwater supply. In recent years the Santa Rosa Subregional System's urban program has expanded to the City of Santa Rosa itself, which now serves numerous west-side properties with recycled water for landscape irrigation. The City of Santa Rosa is also developing a Salt and Nutrient Management Plan for the entire Santa Rosa Plain which addresses most of the new requirements contained in the Draft Order.

Many new requirements in the Draft Order for both existing and future recycled water sites are of great concern and seem burdensome without an identifiable benefit. For example, the Draft Order would require the permittee to take into account the depth to ground water; this information is not known for most current and potential irrigation sites served by recycled water. The proposed requirement to meet quarterly with the current 101 site supervisors is infeasible for the current system, and would likely be considered a compelling reason not to implement the planned expansion of the recycled water system to more fully utilize this valuable resource. RRWA also has concern that additional burdens to recycled water users could result in a loss of the customer base which could hamper regional efforts to follow the State Water Code declaration that "use of potable domestic water for nonpotable uses.... is a waste or unreasonable use of water .... if recycled water is available..." [California Water Code section 13550(a)].

RRWA understands that the City of Santa Rosa is proposing removal of specific sections of the Draft Order that create this undue burden. RRWA supports the City of Santa Rosa's recommended changes and asks the Regional Board to implement these changes to achieve a regulatory framework that recognizes the existing effective program and removes impediments to fully realizing the benefit of our regional recycled water resource.

Sincerely,

A handwritten signature in black ink, appearing to read "Jake Mackenzie". The signature is stylized with a large initial "J" and a long horizontal stroke at the end.

Jake Mackenzie, Chair, Board of Directors  
Russian River Watershed Association

cc: RRWA Board of Directors