

## **Russian River Watershed Association**

### **Oral Comments to the North Coast Regional Water Quality Control Board regarding proposed Basin Plan Amendment to Update Certain Surface and Groundwater Water Quality Objectives June 13, 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 nine member agencies in the Russian River Watershed - from Ukiah to Cotati. All of our member agencies are regulated by this Board, and will be affected by the proposed Water Quality Objectives Basin Plan amendment under discussion today

I realize that RRWA is commenting on this item relatively late in the process. We only recently became aware of the potential impact on our members. We very much appreciate the opportunity to provide comment today.

First, RRWA supports the comments provided by the City of Santa Rosa - both orally today in previously in writing. We appreciate the level of review Santa Rosa has undertaken, and the concerns they have articulated are shared by RRWA member agencies.

We have a particular interest in seeing the BPA modified to include more specific water quality objectives associated with designated beneficial uses. The narrative water quality objective approach of the current draft, coupled with the "translator policy" would require a case-by-case determination of specific water quality objectives. This puts the regulated city or district in the position of having to speculate on the requirements they will need to attain. Sound planning, and project and policy development cannot take place in this environment of uncertainty.

We have special concern for our smaller agencies, such as the City of Ukiah and the City of Healdsburg. The impact of this uncertainty is magnified, for example, when the customer base supporting NPDES Wastewater compliance, and population base of the General Fund supporting NPDES Stormwater compliance, are intrinsically smaller.

We join with Santa Rosa and CASA in supporting your staff's decision to revisit this Basin Plan amendment; and to take an approach of adopting more specific water quality objectives or modifying the translator policy to provide more predictability for permittees.