



September 16, 2010

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

VIRGINIA PORTER
Executive Director

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Ukiah, CA 95482
(707) 833-2553

Ms. Cathleen Goodwin
California Regional Water Quality Control Board
North Coast Region
5550 Skylane Boulevard, Suite A
Santa Rosa, CA 95403

City of Healdsburg Wastewater Treatment Facilities
Draft Waste Discharge Requirements Order No. R1-2010-0034
Russian River Watershed Association (RRWA) Comments

Dear Ms. Goodwin:

This letter presents comments from the Russian River Watershed Association (RRWA) on the Regional Water Quality Control Board's ("Regional Board") Draft Waste Discharge Requirements and Master Reclamation Requirements ("Healdsburg permit") (NPDES Permit No. CA 0025135) for the City of Healdsburg dated August 13, 2010. The RRWA includes nine 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. 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 and wastewater. We appreciate the opportunity to comment on the Healdsburg permit, which as we explain below will have implications for all of our member agencies.

The draft permit appears to recognize the challenges of determining compliance with receiving water limits in Basalt Pond by requiring two special studies to assess receiving water conditions and to determine appropriate receiving water monitoring requirements and monitoring locations for specific conductance (SC), total dissolved solids (TDS) and other constituents. While we appreciate recognition of the compliance determination challenges in Basalt Pond, we think this only partially addresses the problem. We are concerned that the water quality objectives for SC and TDS in the Russian River (which are the basis of the receiving water limits being applied to Basalt

Pond) are based solely on ambient water quality data available at the time the objectives were established many years ago, and may be more stringent than needed to protect beneficial uses. We urge the Board to formally review SC and TDS objectives for the Russian River.

The March 22, 2010 draft of the Healdsburg permit added several new recycled water requirements in Attachment G, including new approval and public review steps for the addition of new recycled water users to the recycled water system. Since Regional Board staff have made clear that the draft Healdsburg permit will likely be the template for renewed Master Reclamation Permits in Region 1, our member agencies will be directly affected by this permit. Our primary concern has been that many of the Attachment G requirements in the March 22nd draft Healdsburg permit would be inconsistent with the State Water Resources Control Board's ("State Board") Recycled Water Policy (May 2009) because they would discourage, rather than encourage, recycled water use, impeding its specific goal of "substitution of as much recycled water for potable as possible by 2030."

We have limited our comments on the recycled water provisions of the Healdsburg permit to what we believe are the common key concerns of our member agencies. Our concerns are summarized below.

New Requirements for Recycled Water Use Site Approvals

Attachment G to the Healdsburg Permit draft permit includes new provisions for adding recycled water users which would go well beyond what has typically been required of other water recyclers regionally and statewide. In the view of our member agencies this is well beyond what is necessary. RRWA members believe that the existing Title 22 reclamation requirements, such as those issued for Santa Rosa and Windsor, are more than adequate to protect water quality.

Many of the Attachment G provisions in the Healdsburg draft permit; and in particular the additional approval, public input and special study requirements; have the potential to discourage new recycled water use. In the current draft of the Healdsburg permit, the additional "General Technical Report Requirements" for agricultural irrigation have been modified so that only Programmatic Technical Reports are subject to public notice and comment, rather than every site-specific report. In our view this is a significant improvement over the requirements in the March 22nd draft, which would have subjected each new use site to a new Report of Waste Discharge, public noticing and comment, and potentially endless special study requirements. While we generally support and

appreciate these revisions to the March 22nd draft, we remain unconvinced of the need for any new requirements beyond those in the new State Recycled Water Policy, which apply only to landscape irrigation projects. Our greatest concern is that these requirements could become a significant impediment to attracting new agricultural users. If this permit is adopted in its present form, we urge the Regional Board to periodically review the impact of these new requirements to determine whether they impede development of new recycled use sites, and if so, modify the permit accordingly.

We are also concerned with the specific requirement for quarterly reporting while the Statewide General Permit for Landscape Irrigation requires only annual reporting. We believe alignment with the State accepted reporting standards will better position our region to succeed in supporting the statewide goals of utilizing the recycled water resources appropriately.

Nutrient Management

RRWA supports the proposed requirement to inform recycled water users of the nutrient content in recycled water so that irrigation managers can take this into account when they calculate agronomic rates for supplemental fertilization. RRWA would oppose any requirements similar to those included in the March 22nd draft, which would make recycled water providers responsible for *all* nutrients applied on recycled water use sites managed by others. This would require that recycled water providers inappropriately intrude into the crop management practices of private users. The current draft of the Order and Attachment G appear to resolve this by clarifying that compliance will be determined by meeting the reporting requirements. We strongly urge the Regional Board to retain this wording, i.e. where compliance is determined by providing the nutrient information to recycled water users.

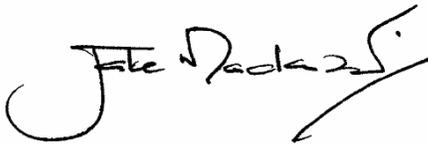
For a number of reasons, we also believe that this should be satisfied by seasonal rather than monthly reporting to users, since effluent quality variation is typically minor relative to crop demand (as noted in the Yates report cited in the Healdsburg permit), and the information cannot be used to alter real-time crop management. In addition, monthly reporting to individual users would be unnecessarily burdensome for providers such as Santa Rosa with large numbers of users. Alternatively, the information could be made available by posting on websites operated by recycled water providers. We suggest that nutrient concentration be reported to users monthly only when more than 65 percent of the agronomic nutrient demand of plants is met with recycled water.

Runoff Control

Provision B.11.a includes a requirement for a 100-foot setback from any surface water, or alternatively, a justification from the provider on why the setback would be infeasible. This requirement, which has no rationale or justification, could needlessly eliminate wide swaths of use sites. Irrigation systems properly designed and managed in accordance with Title 22 requirements are more than adequate to prevent runoff to surface water, whether they are 50 or 500 feet away from surface water. Such a rigid setback approach was considered and rejected during the stakeholder process leading up to the adoption of the State Recycled Water Policy, and should not now be revived and imposed through the Healdsburg permit. RRWA strongly urges the Regional Board to eliminate this requirement, and instead rely on the existing provisions in Title 22 to prevent recycled water runoff to surface waters, which we believe are fully protective.

Again, we greatly appreciate your consideration of these comments.

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, www.rrwatershed.org

cc: RRWA Board of Directors