

**Response to Written Comments
and
Staff Initiated Changes**

**on the draft Cease and Desist Order No. R1-2016-0016
for the City of Healdsburg Wastewater Treatment, Recycling, and Disposal Facility**

**Regional Water Quality Control Board, North Coast Region
June 16, 2016**

Comment Letter Received

The deadline for submission of public comments regarding draft Cease and Desist Order No. R1-2016-0016 for the City of Healdsburg Wastewater Treatment, Recycling, and Disposal Facility (Draft CDO) was April 4, 2016. The City of Healdsburg (City) provided timely comments. In this document, the comments are reproduced in their entirety and followed by the Regional Water Board staff response. In addition, the revised draft of Cease and Desist Order No. R1-2016-0016 is referred to in this document as the Proposed CDO.

City of Healdsburg CDO Comments

Comment 1: Finding 21. Date of "June 12, 2016" should read "June 16, 2016".

Response 1: Correction made.

Comment 2: Requirement 2, Task B and Task D. The City is working with vineyard managers and owners to bring additional acreages into the recycled water program as quickly as possible. The Board should be cognizant that drought and dryer than normal years make the vineyard managers and owners more motivated to receive the recycled water than wet years do. Wet years are part of the normal weather pattern and may slow progress on Tasks B and D.

Additionally, normal to wet precipitation seasons may reduce irrigation demand/consumption in certain years. The City is in the process of discussing vineyard water usage and other pertinent parameters with local vintners. It may be possible that the City could achieve the requirement of Task B, but not achieve Task D consistently due to circumstances the City cannot control.

The City is preparing an estimated timeline to comply with the permit requirements that accounts for the schedule to build the recycled water distribution system as well as potential uptake and usage rates of end users. The City recommends that Task B be revised to serving recycled water to 2,000 acres by September 30, 2019. We request that Task B have the following phrase deleted, "or as required to increase the Permittee's recycled water use to achieve compliance with Discharge Prohibition III.1 of Waste Discharge Requirements Order No. R1-2016-0015." [Note that the City's comment referred to Task D in this paragraph, but Regional Water Board staff confirmed that the City intended to refer to Task B.]

Response 2: Task C of the Proposed CDO (Task B of the Draft CDO) has been modified as requested.

Comment 3. *The City also requests that the Board add Task E as follows: “Task E. Complete construction of recycled water transmission pipeline to serve additional acreage as required to increase the permittee’s recycled water use to achieve compliance with Discharge Prohibition III.1 of Waste Discharge Requirements Order No. R1-2016-0015 – To Be Completed by September 30, 2024.”*

Response 3: A new task has been added to the Proposed CDO as requested by the City. New Task D has been added as follows: “Complete construction of recycled water transmission pipeline to serve additional acreage as needed to increase the Permittee’s recycled water use to achieve compliance with Discharge Prohibition III.1 of Waste Discharge Requirements Order No. R1-2016-0015.” Task D is to be completed by July 31, 2021 to coincide with the end of the term of Order No. R1-2016-0015.

Regional Water Board staff also modified Task F of the Proposed CDO (Task D of the Draft CDO) to require the City to achieve compliance with Discharge Prohibition III.I (requirement to cease discharges to Basalt Pond for the period May 15 through September 30 each year) of the Proposed Permit by July 31, 2021. This change provides consistency with the date in Task D of the Proposed CDO. If the City is unable to comply with Discharge Prohibition III.I with their current plan to increase agricultural recycled water use, the City must evaluate other options to achieve compliance such as identifying other potential recycled water users, including urban users, and construction of additional recycled water storage. The City must make all reasonable efforts to achieve compliance with the discharge prohibition by this date. Per Task E of the Proposed CDO (Task C of the Draft CDO), the City shall submit reports semi-annually describing its progress toward compliance with the Discharge Prohibition III.I.

Requirement 5 of the Proposed CDO allows the Permittee to request that the Regional Water Board grant time extensions for cause and with proper justification. The Permittee could utilize this requirement during the term of the Proposed CDO compliance schedule (which coincides with the expiration date of Waste Discharge Requirements Order No. R1-2016-0015 that is proposed for adoption concurrently with the Proposed CDO) or in time to update the compliance schedule in conjunction with the next permit renewal in 2021.

Regional Water Board Staff Initiated Changes

Regional Water Board staff added another new task to the Proposed CDO as Task B, requiring the Permittee to conduct a study and prepare and submit by August 1, 2018, a report evaluating the feasibility of completing a recycled water system that serves urban and agricultural recycled water users to achieve full compliance with the seasonal discharge prohibition in Prohibition III.I of the Proposed Permit. Regional Water Board staff determined that this new task is necessary in light of the Permittee’s request for additional time to achieve compliance with Discharge Prohibition III.I of the Proposed Permit and the Permittee’s statements regarding the uncertainties associated with agricultural use in Comment 2 (paragraphs 1 and 2), above.