



CF/43-0-1 Water Quality Control Plan (aka Basin Plan) for
the North Coast Region (ID 1164)

January 9, 2015

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Regional Water Quality Control Board, North Coast Region
Supervisor, Planning Unit
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Re: 2014 Triennial Review of the Water Quality Control Plan for the North Coast Region

The Sonoma County Water Agency (Water Agency), on behalf of itself and the sanitation districts and zones it manages appreciates this opportunity to comment on the *2014 Triennial Review of the Basin Plan, Draft Proposed Basin Plan Amendment Project Priorities* for the North Coast Regional Water Quality Control Board. The Water Agency is a State special district that conducts activities and maintains and operates facilities related to water supply, flood control and sanitation. Please consider the following comments regarding the proposed Basin Plan Amendment Project priorities. Comments are provided by number as presented in the Staff's Recommended Project Ranking section (Section 2.3) of the above-mentioned document.

#1 TMDL Action Plans

The Water Agency supports the ongoing High Priority effort of the North Coast Regional Water Quality Control Board (Regional Board) to develop a TMDL to address pathogens in the Russian River and to address nutrient, dissolved oxygen, temperature, and sediment issues in the Laguna de Santa Rosa. The Water Agency supports the development of an implementation plan for the Laguna TMDL that would include a nutrient credit trading program to help offset nutrient and sediment inputs into the Laguna de Santa Rosa and provide for a reduction in eutrophic conditions that contribute to low dissolved oxygen concentrations and high temperatures.

#2 Water Quality Objectives Update Amendment

The Water Agency agrees that updating and clarifying water quality objectives should remain a high priority for the Regional Board. The Water Agency encourages the Regional Board to clearly describe the process it will use when translating the proposed narrative water quality objectives into numeric limits for specific uses in permits, orders or other Board actions to provide greater consistency and certainty to the permitting process. The Water Agency also supports the effort to update the dissolved oxygen objectives and establish life cycle requirements for the protection of sensitive salmonid species, while also recognizing that site-specific objectives may be appropriate in areas where natural conditions do not allow dissolved oxygen concentrations to support life cycle requirements.

#3 Develop Criteria for Exemption from Seasonal Discharge Prohibition

The Water Agency supports the development of criteria to allow for exemptions from seasonal discharge prohibitions and the potential for flow augmentation benefits. The Water Agency is interested in working with other dischargers and the Regional Board to develop criteria to allow for exemptions from the seasonal discharge prohibition in the Russian River Basin. A collaborative effort similar to that utilized in the development of technical information to support preparation of a mixing zone policy may be an effective way to address this project. Benefits of exemptions from the seasonal discharge prohibitions could allow dischargers greater operational flexibility, especially in the late spring and early fall rain events when land disposal is not an option and streamflows are adequate for discharge.

With regard to the potential for flow augmentation benefits, the Water Agency would like to ask that the Regional Board take into consideration the ongoing effort of the Water Agency, US Army Corps of Engineers, and the National Marine Fisheries Service and the issuance of the Biological Opinion in 2008 that requested modifications to Upper Russian River instream flows requirements to address rearing habitat conditions when considering the development of numeric flow objectives for the Russian River. The Biological Opinion identifies the need to establish lower summertime flows in the mainstem Russian River and Dry Creek for the benefit of salmonids.

#4 Phase II - Groundwater Protection Policy

The Water Agency supports the development of the Groundwater Protection Policy, including the policy to promote recharge and the programmatic approach to manage salts and nutrients in groundwater, and agrees with the high priority status. The proposed policy to promote groundwater recharge should build upon the existing Basin Plan's recognition of groundwater recharge as a beneficial use for much of the surface water resources within the North Coast Region, including those within the entire Russian River Hydrologic Unit. Such beneficial use of surface water is defined in the existing Basin Plan as "Uses of water for natural or artificial recharge of groundwater for purposes of future extraction, maintenance of water quality, or halting of saltwater intrusion into freshwater aquifers".

In addition to promoting stormwater recharge, the proposed policy should also promote the conjunctive management of surface water and groundwater supplies, such as in-lieu recharge and groundwater banking programs that utilize drinking water for recharge, storage and recovery. Such programs are encouraged in recent local and State initiatives and policies, including the Santa Rosa Plain Watershed Groundwater Management Plan (2014) the Sustainable Groundwater Management Act of 2014, and the Governor's California Water Plan. The Water Agency also supports development of a programmatic approach to managing salt and nutrients in groundwater that recognizes the purpose of the Recycled Water Policy, which is to increase the appropriate use of recycled water from municipal wastewater sources.

8 Develop a Mixing Zone Policy for human health-based constituents

The Water Agency supports the development of a mixing zone policy as a way to provide greater clarity to dischargers and regulators to delineate and designate allowable levels of effluent entering a surface water system and would like to request that this item be moved from medium priority to high priority. The Water Agency recognizes that a mixing zone policy would support and provide additional clarity to the process of establishing exemptions to seasonal discharge prohibitions, which has been identified as a high priority Basin Plan amendment project. For this reason, the Water Agency would suggest both policies be developed in a coordinated effort as high priorities.

Please contact Pam Jeane at Pam.Jeane@scwa.ca.gov or 707-521-1864 with any questions regarding these comments. Again, we appreciate the opportunity to comment on the 2014 Triennial Review.

Sincerely,



Grant Davis
General Manager