
675 Wildwood Avenue
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December 16, 2016

North Coast Regional Water Quality Control Board
5550 Skylane Blvd., Suite A
Santa Rosa, CA 95403

Via Email: NorthCoast@WaterBoards.ca.gov
Cathleen.Goodwin@waterboards.ca.gov

Dear Regional Water Board members and Ms. Goodwin:

The City of Rio Dell (City) provides the attached comments on the draft NPDES permit for the City's wastewater treatment plant discharges in redline and strikethrough format in **Attachment A**. Many of the proposed limits are very stringent, much more than others upstream of our drinking water intake (e.g., Town of Scotia). Importantly, there are no drinking water intakes downstream of our City's. Therefore, the municipal drinking water (MUN) is not appropriately designated below our effluent outfall to the Eel River and we would like to discuss how to de-designate that use in accordance with the Vacaville order by the State Water Resources Control Board in 2002. (SWRCB Order No. WQO 2002-2015 at p. 17.) In that decision, the State Board held that *"where a Regional Water Quality Control Board (Regional Board) has evidence that a designated use does not exist and likely cannot be feasibly attained, it is unreasonable to require a discharger to incur control costs to protect that use. This is true at least in the interim until the Regional Board either successfully amends the basin plan to de-designate the use or determines that the use cannot be legally de-designated. At a minimum, where a Regional Board has evidence that a use neither exists nor likely can be feasibly attained, the Regional Board must expeditiously initiate appropriate basin plan amendments to consider de-designating the use."* (*Id.* (emphasis added).) Forcing the City to meet stringent human health-based criteria from the California Toxics Rule ("CTR") and Title 22 Maximum Contaminant Levels ("MCLs") is not appropriate to protect a non-existent use.

The City has researched the water rights downstream and there are no municipal users, only agricultural water diverters. (See **Attachment B**, water rights information.) The Eel River need not meet MUN standards when there are no MUN uses. Therefore, we request that de-designation proceedings occur right away.

In the interim, until de-designation occurs, the City requests that reasonable potential be run utilizing dilution credits of 100:1. As the permit only authorizes discharges when the effluent is less than 1% of the flow, there is at least 100:1 dilution available and it is unreasonable to not

look at that when determining reasonable potential and/or when calculating effluent limits. If limits included some dilution credit, then the limits might be attainable. Currently, the City is likely to be in violation and enforcement jeopardy since no schedule for compliance or dilution credits are given.

The City also has concerns over the mandate to use un-promulgated chronic toxicity test procedures and statistics. NPDES permits are required to use Part 136 methods, and the Test of Significant Toxicity (“TST”), pass/fail endpoint, use of 100% effluent compared to control, and other requirements in this permit are not authorized in Part 136, and are only “endorsed” by USEPA (as noted in the Fact Sheet), and have not been formally promulgated. Because State Board precedent (Order No 2003-0012) is still binding, the Regional Board has no power to veer from the requirements of that order, which require a narrative limit for chronic toxicity if reasonable potential exists, and a numeric trigger (based on chronic toxicity units (“TUc”) with credit for dilution). The permit must be modified to be consistent with this precedent.

Other comments are embedded in **Attachment A**, and we have created a list of these comments so that you may use them to respond to our comments in **Attachment C**.

Please let us know if you have questions about our comments or would like to meet in person or by phone to discuss these comments further.

Respectfully yours,

Kyle Knopp
City Manager
City of Rio Dell



Attachment C

Page 1,

Table1. Permittee Information,

Comment A1: Upgraded plant design capacity is 0.50 mgd, not 0.40.

Page 2,

Table3. Administrative Information,

Comment A2: This should be April 28th to be consistent with the 1989 MOU with EPA.

Page 4,

II. Findings

1. Legal Authorities

Comment A3: Editorial changes. The highlighted part of the sentence duplicates the next sentence and should be kept in two parts to describe federal and state law separately.

2. Provisions and Requirements Implementing State Law

Comment A4: All of section III is state law requirements. None are required by CWA or federal regulations.

Comment A5: More than just subsection B are state law requirements.

Page 5,

III. Discharge Prohibitions

1. Comment A6: You cannot disclose an unplanned or emergency discharge, and these discharges are covered by other prohibitions.
5. Comment A7: This duplicates III.B and III.D. and is not necessary.
7. Comment A8: This duplicates III.A. and does not need a separate prohibition.
8. Comment A9: Was 0.9 mgd in last permit.

Comment A10: Flow is not required to be regulated under federal law, and in fact case law disallows EPA from regulating flow. Thus, there is no federal law reason for including this requirement.

In addition, the reason in the fact sheet for this is to maintain compliance with effluent limits. However, the Water Boards cannot prescribe the manner of compliance under Water Code section 13360(a). Because the flows cannot be controlled, the effluent limits on constituents of concern should control. This requirement should be removed.

Comment A11: There is no K, L, or M in Section VII.

10.1 Comment A12: Please clarify how discharges can be adjusted daily. This should be averaged over a month only.

Page 6,

Table 4

Comment A13: Because discharges are only allowed when effluent is 1% of the flow, the water quality-based limits should reflect dilution credits up to 100:1 dilution. In addition, for the human health criteria, these should only be monthly average limits because there is no acute need for a daily or short term limit because those criteria are set for 70 years of exposure. Finally, there is no MUN use downstream of this discharge, so there is no need to include effluent limitations to protect MUN.

Comment A14: Limits for POTWs are supposed to be monthly and weekly averages. The Fact Sheet does not explain why weekly averages are impracticable as required by 40 C.F.R. §122.45(d)(2). Daily limits are unnecessary for long term human health criteria.

Comment A15: Mass limits are not required under 40 C.F.R. §122.45(f) and should be removed. Were properly removed from Fortuna permit.

Page 7,

Effluent Limitations 1

Comment A13: Because discharges are only allowed when effluent is 1% of the flow, the water quality-based limits should reflect dilution credits up to 100:1 dilution. In addition, for the human health criteria, these should only be monthly average limits because there is no acute need for a daily or short term limit because those criteria are set for 70 years of exposure. Finally, there is no MUN use downstream of this discharge, so there is no need to include effluent limitations to protect MUN.

Comment A14: Limits for POTWs are supposed to be monthly and weekly averages. The Fact Sheet does not explain why weekly averages are impracticable as required by 40 C.F.R. §122.45(d)(2). Daily limits are unnecessary for long term human health criteria

Acute Toxicity

Comment A16: There is no discussion that there is reasonable potential for acute toxicity. Without reasonable potential, there is no requirement for an acute toxicity limit and it should be removed. Water is protected by V.A.12., and a reopener is available in Section VI.C.1.c. if reasonable potential exists in the future.

Comment A17: There are numbers in this section, not letters.

2. Chronic Toxicity

Comment A18: It is not clear that there is reasonable potential for chronic toxicity since there was only one issue related to foaming that was resolved. Without reasonable potential, there is no requirement for a chronic toxicity limit and it should be removed. Water is protected by V.A.12., and a reopener is available in Section VI.C.1.c. if reasonable potential exists in the future.

Further, the TST referenced in section VII. of this Order is not an approved statistical method for determining toxicity contained in the 2002 Methods formally adopted by USEPA and there is no longer an approved Alternate Test Procedure (ATP) as recognized by the Fact Sheet. Monitoring

must be based on Part 136 methods. 40 C.F.R. §122.41(j)(4); §122.44(i). The permit should maintain the trigger approach based on TUC mandated by the State Water Board in 2003 that is still binding and precedential.

2. Interim Effluent Limitations- Not Applicable

Comment A19: The text in the “non-applicable” sections is not numbered, and should be consistent.

Page 8,

B. Land Discharge Specifications and Requirements-Discharge Point 003

1. Land Discharge Specifications and Requirements

Comment A20: Since the samples are taken at same location, there can be just one monitoring location even though there are 2 approved discharge locations.

Table 5. Land Discharge Specifications

Comment A21: There is no need for a settleable solids limit for land application.

C. Flow.

Comment A22: Was previously 0.62 mgd dry and 1.25 mgd peak wet weather. There is no need for a flow limit because the plant is constrained by capacity even without such a limit. In addition, there is already a proposed prohibition addressing flow, so this creates two potential violations for one event. Further, the City had asked for higher flow for irrigation, and wanted monthly average, not max daily.

2. Land Discharge Requirements. Comment A23: The land discharge provisions should be in this section because disinfected secondary treated water can be considered “recycled water” under the Water Code §13050(n) and Title 22. If not treated as recycled water, then this activity should be regulated in a separate WDR so it does not have to be reissued every 5 years and is not part of a federal permit.

Page 9,

J. Comment A24: Having a fenced and gated area should be sufficient. This is unnecessary micromanagement.

C. Comment A25: The land discharge provisions should be in this section because disinfected secondary treated water can be considered “recycled water” under the Water Code §13050(n) and Title 22.

D. Comment A26: It needs to be clear that these requirements do not constitute effluent limits and are not subject to MMPs.

1. Total Residual, Monitoring LocationINT-001.

Comment A27: The 1.5 mg/L minimum was removed in favor of this language "the total residual chlorine concentration shall be maintained at a level that ensures the discharge meets the total coliform effluent limitation at the end of the disinfection process for discharges" It's assumed that “meets the effluent limitation” means that we pass our coliform test? If we are complying with the coliform limitation, isn't that proof that we are maintaining a level that ensures compliance. We should not need to install a continuous analyzer to demonstrate what we've already demonstrated by not failing coliform tests.

This violates the Water Code prohibition on the Water Board prescribing manner of compliance under section 13360(a).

The City can comply with coliform in any legal manner. Further, requiring minimum Cl residual can adversely impact ability to meet disinfection byproducts. For these reasons, these requirements should be removed.

Page 10,

2. Total Residual Chlorine, Monitoring Location EFF-001.

Comment A28: These requirements are not necessary because of SO₂ monitoring. The Water Code does not allow the Water Boards to prescribe how to comply and Rio Dell can demonstrate compliance with SO₂ monitoring instead of chlorine residual monitoring.

V. Receiving Water Limitations, A. Surface Water Limitations, Comment A29: This phrase is not needed because each paragraph repeats this.

1. Comment A30: The highest adopted number in the Basin Plan is 9, so there is no authority for 10 mg/L.

Page 11,

10. Comment A31: This language should more closely track the Basin Plan language.

13. Comment A32: This is not required by the Basin Plan. The Basin Plan at p. 3-4.00 allows a 5 degree increase in COLD waters.

15. Comment A33: MCLs are set as annual averages for drinking water and were not initially intended to be used as Water Quality Objectives (WQOs). If used for WQOs, then they need to mirror those requirements as annual averages.

17. Comment A34: Clarification that applies to receiving water – all others are clear on that point,

Page 12,

18. Comment A35: MCLs are set as annual averages for drinking water and were not initially intended to be used as Water Quality Objectives (WQOs). If used for WQOs, then they need to mirror those requirements as annual averages.

B.

1. Comment A36: This is not a Basin Plan or even a true antidegradation requirement. Further, title 27 is not necessarily required for wastewater facilities otherwise in compliance. This section should be removed.

2. Comment A37: MCLs are set as annual averages for drinking water and were not initially intended to be used as Water Quality Objectives (WQOs). If used for WQOs, then they need to mirror those requirements as annual averages.

3. Comment A38: See last comment

Page 13,

C. Special Provisions,

2. **Reasonable Potential.** Comment A39: Numbering needs to be fixed.

Page 14,

2. Special Studies, Technical Reports and Additional Monitoring Requirements – Not Applicable,

a. **Ammonia Study.** Comment A40: Can this be allowed to be a joint study with Fortuna so that both cities don't need separate studies?

Page 16,

5. Special Provisions for Municipal Facilities (POTWs Only),

2. Source Control and Pretreatment Provisions,

a. Comment A41: This presumes such authority does not exist.

Page 17,

f. Comment A42: Unclear how this was to be done without the added language

Page 19,

Biosolids Management. Comment A43: The numbering on these pages needs to be corrected – corrupt in the Word version provided.

Page 21,

2. Other Special Provisions

a. **Storm Water.** Comment A44: This is beyond the scope of this wastewater permit. In addition, there is a berm around facility built by Corps of Engineers that prevents run-on. Therefore, this requirement is unnecessary.

7. Compliance Schedules- Not Applicable. Comment A45: As previously discussed, if no dilution is granted, then the City should be granted a time schedule that would allow time to come into compliance or de-designate the MUN use driving those limits as prescribed in the State Water Board’s Vacaville decision, Order No. WQO 2002-2015 at p. 17 (“where a Regional Water Quality Control Board (Regional Board) has evidence that a designated use does not exist and likely cannot be feasibly attained, it is unreasonable to require a discharger to incur control costs to protect that use. This is true at least in the interim until the Regional Board either successfully amends the basin plan to de-designate the use or determines that the use cannot be legally dedesignated. At a minimum, where a Regional Board has evidence that a use neither exists nor likely can be feasibly attained, the Regional Board must expeditiously initiate appropriate basin plan amendments to consider dedesignating the use.”)

Page 22,

3. Average Monthly Effluent Limitations (AMEL), Comment A46: Violations can only be assessed after due process and a review of the evidence to see if there are any defenses or other information to make it not a “violation.”

4. Average Weekly Effluent Limitation (AWEL), Comment A47: Violations can only be assessed after due process and a review of the evidence to see if there are any defenses or other information to make it not a “violation.”

Page 23,

10. Chronic Toxicity, Comment A48: This language is inconsistent with the proposed Fortuna language substituted in. Also, the TST is not a promulgated Part 136 method and cannot be used.

Page 25,

12. Mean Annual Flow, Comment A49: This serves no regulatory purpose and should be deleted.

14. Mass Based Effluent Limitations, Comment A50: No mass limits should be required. This change would be consistent with the proposed Fortuna permit.

Page A-2,

Effective Concentration (EG), Comment A51: This is unnecessary if TUc is used.

Enclosed Bays, Comment A52: Definition not relevant to permit.

Inhibition Concentration, Comment A53: Unnecessary if TUC is used.

Page A-6,

Test of Significant Toxicity (TST), Comment A54: Cannot use guidance to regulate when the regulations clearly specify the use of Part 136 methods.

Page E-2,

I. General Monitoring Provisions

2. Supplement Monitoring Provision, Comment A57: Federal regulations require the use of Part 136 methods.

5. Minimum Levels (ML) and Reporting Levels (RL), Comment A58: It is unclear why this table is needed as they are listed in the SIP and apply to all CTR constituents, not just these.

Page E-3,

Table E-2. Monitoring Stations Locations,

Comment A59: This information is irrelevant and should be removed.

Comment A60: EFF-001 and -003 are taken at same location so no need for different monitoring locations.

Page E-7,

6. Quality Assurance and Additional Requirements,

Comment A61: Not an approved method or statistical procedure.

Page E-8,

8. Accelerated Monitoring Requirements,

Comment A62: The limit is no acute toxicity

Page E-9

2. Discharge In-stream Waste Concentration (IWC) for Chronic Toxicity,

Comment A63: The 2002 Methods prescribe use of all 5 concentrations in order to see a dose-response curve. Use of only IWC and control violates the promulgated test method.

3. Freshwater Test Species and Test Methods,

Comment A64: The methods and statistics being prescribed are not contained in the approved methods document cited.

Page E-10,

7. Notification,

Comment A65: This can also be provided a dilution credit

Page E-12,

C. Toxicity Reduction Evaluation (TRE) Process,

1. TRE Work Plan, Comment A66: Unclear why this is needed by this date.

Page E-16,

IX. Other Monitoring Requirements,

Comment A67: This should be removed and the City should just be required to meet coliform.

Page F-3,

I. Permit Information,

Table F-1 Facility Information,

Comment A68: Design flow is all that is needed. No authority to regulate flow.

Page F-4,

B. Comment A69: Need to explain delay in permit reissuance and that current permit still applicable.

II. Facility Description,

A. Description of Wastewater and Biosolids Treatment and Controls,

Comment A70: Double check values.

Page F-7,

Table F-3. Historic Effluent Limitations and Monitoring Data- Upgraded WWTP

Comment A71: This shows that no longer any RP for acute toxicity and limit should be removed.

Page F-8,

III. Applicable Plans, Policies, And Regulations

C. State and Federal Laws, Regulations, Policies and Plans,

1. Water Quality Control Plan,

Comment A72: See information provided on actual water rights downstream, which are only agricultural, not MUN.

Page F-9,

Table F-4. Basin Plan Beneficial Uses,

Comment A73: MUN is not an existing use downstream of Fortuna and there are no drinking water intakes downstream.

Comment A74: All discharges should then get 100:1 dilution credits. There is a big disconnect in implementation of this requirement when calculating effluent limits. Limits to the ponds would also justify dilution/soil aquifer treatment credit and should not be end of pipe limits for water quality-based limits.

Page F-10,

6. Antidegradation Policy.

Comment A75: A 1968 Resolution cannot incorporate a future policy

Page F-12,

E. Other Plans, Policies and Regulations,

3. Comment A76: This Order should not require coverage under another permit that is a separately enforceable program. This needs to be worded like the SSO WDR – that the permittee has coverage under it, but it is separate. We don't want citizen suits for biosolids issues related to a different permit under this permit.

Page F-13,

A. Discharge Prohibitions, Comment A77: See notes in permit on duplicative prohibitions that are unnecessary and just create two (or three) potential violations for a single action.

Page F-15,

8. Prohibition III.H.

Comment A78: Again, this is using a surrogate when the effluent limits should be what applies. If effluent limits are violated because of flow, then the City will

need to remedy that, but there should not be additional limits and prohibitions that are included to try to prevent effluent limit violations. The Water Code does not allow prescribing the manner of compliance with limits.

Page F-17,

Comment A80: Providing justification for no mass limits.

Mass-Based Effluent Limitations,

Comment A81: This is inconsistent with requirements for other POTWs and not required.

Comment A82: The City will seek to control I/I as that can also cause sewer spills, which are separately regulated

Page F-18,

Comment A83: This is wholly irrelevant to this permit.

Page F-19,

Comment A84: Most were not adopted by the DDW, and therefore failed to incorporate appropriate 13241 analysis or 13242 implementation plans.

3. SIP, CTR and NTR,

Comment A85: Title 22 is now being overseen by the Water Boards and implementation of Title 22 drinking water limits must be recognized on the discharge/ambient side.

3. Determining the Need for WQBELs

Comment A86: There is no impracticability analysis to justify daily limits, which are not required for POTWs, only monthly and weekly averages pursuant to 40 C.F.R. §122.45(d)(2).

Page F-20,

b. Chlorine Residual, Comment A87: Since the limits for chlorine and ammonia are stated to protect against toxicity, no toxicity limit is required. 40 C.F.R. §122.44(d)(1)(v). Toxicity monitoring and a narrative effluent limit and trigger are all that should be required per the State Water Board's precedential order.

Page F-23,

Comment A88: Because there is no RP and no dilution was considered in the RP, which should be based on the TSD, not the SIP, which only applies to CTR/NTR criteria, there should be no limit for ammonia. Otherwise, this punishes the City even though they are performing well.

g. Haloacetic Acids, Comment A89: Although the waters are designated MUN, there is no downstream MUN intake for municipal drinking water and this use is not an existing use and could be de-designated.

These MCLs were designed to apply to treated drinking water at the tap, not end of pipe wastewater effluent limitations as they never complied with Water Code section 13241 when these were adopted into Title 22 or incorporated into the Basin Plan by reference. If maintained, there should be a dilution credit of 100:1 and under the TSD, there would be no reasonable potential.

Page F-25,

Reasonable Potential Determination, Comment A90: Reasonable potential is required for all pollutants, but has not been done for toxicity, settleable solids, and other conventionals. Non-CTR/NTR should be determined using the TSD, not the SIP.

Page F-26,

Table F-6. Summary of Reasonable Potential Analysis Results,

Comment A91: This paragraph does not need to be in here twice. Furthermore, this is unnecessary analysis where RP has already been determined.

Page F-27,

Table F-7. Effluent Trihalomethane Concentration in June 20,2016 Sample

Comment A92: Using the TSD method for determining reasonable potential with dilution credit of 100:1 dilution, there would be no reasonable potential. In addition, this limit duplicates the CDBM and DCBM limits already included in the permit.

Page F- 28,

4. WQBEL Calculations,

Step 1, Comment A93: Why is this the case when discharges are limited to when effluent is 1% of the flow. By not including dilution, the limit is unnecessarily stringent and places the City in enforcement jeopardy. Since these are all new, more stringent limits, a compliance schedule would be needed if dilution is not granted

Page F-30,

1. Acute Aquatic Toxicity,

Comment A 94: Should not be maintained if no RP.

Page F-31,

Table F-11. Summary of Chronic Toxicity Results, Comment A95: This data is too old and from old treatment system. Under Woodland decision, only last 3 years of data should be used.

Comment A96: People consider pass/fail to be numeric limits. Because the current construct interprets the narrative that way, it essentially becomes a numeric limit, which is not allowed under the State Board's precedential order, which requires narrative limits and numeric triggers for accelerated testing.

Comment A97: Until that is final, Order 2003-0012 is a binding precedential order and must be followed.

Pages F-31- F-33,

Comment A98: This needs to be consistent with 2003-0012.

Test of Significant Toxicity (TST),

Comment A99: This is not a rule and should not be treated as such.

Comment A100: There is no approved ATP to allow use of the TST approach.

Comment A101: If EPA believes it is beneficial, then it should be promulgated as a rule.

Comment A102: Pass/fail is not an approved endpoint in Part 136.

Comment A130: This is not accurate. Federal rules for NPDES permits require compliance with Part 136 methods.

Comment A104: This is not true because more replications may be required.

Comment A105: This null hypothesis is not authorized by Part 136.

Page F-34,

Comment A106: Already being required.

Page F-35,

Comment A107: Where have these been considered?

F. Land Discharge Specifications and Requirements,

1. Scope and Authority

Comment A108: Where is the evidence of that consideration?

Page F-36,

BOD₅ and TSS,

Comment A109: This change is appreciated to remove mass limits and percent removal.

Comment A110: This change is appreciated to remove MDELs for BOD and TSS

Settleable Solids, Comment A111: This is unnecessary for land discharge.

Page F-37,

H. Other Requirements

1. Residual Chlorine, Comment A112: Cannot prescribe how to meet an effluent limit.

Page F-39,

3. Whole Effluent Toxicity (Special Provision VI.C.1.c.)

Comment A113: Limits need not be numeric – can be BMPs or narrative.

Pages F-40 and F-41,

Source Control and Pretreatment Provisions (Special Provision VI.C.5.b)

Comment A114: The City has not industrial users so this is not needed.

Comment A115: This does not apply to the City.

Page F-43,

Comment A116: Fine to request calculation, but should not be a limit.

Comment A117: EPA criteria guidance for aluminum has been determined to not be appropriate given soils in California. Further, it is unlikely that Rio Dell has high aluminum – at most, this should be annual monitoring.

Page F-45,

F. Other Monitoring Requirements

1. Monitoring Location INT-001, Comment A118: SO₂ measurements should be adequate.

Page F-47,

B. Written Comments,

Comment A119: The 18th is a weekend

Page F-49,

Attachment F-1 – City of Rio Dell RPA Summary

Comment A120: All constituents, including ammonia, should be included in this table.

Eel Sr Water Rights

1	2	3	4	5	6	7	8	9
S019284	Humboldt	Van Duzen River	EEL RIVER	ALAN B. BRAINERD	Individual	531362	Claimed	
S020060	Humboldt		EEL RIVER	ALBERT STOCKTON	Individual	532186	Claimed	
S021580	Humboldt	Headwaters, Price Creek	EEL RIVER	ANDREW ANDY WESTFALL	Individual	469169	Claimed	
S016147	Humboldt	SOUTH FORK EEL RIVER	EEL RIVER	BENBOW WATER COMPANY	Corporation	423363	Claimed	
S015419	Humboldt	PRATT MOUNTAIN SPRING	EEL RIVER	BUCK MOUNTAIN RANCH	Corporation	437931	Claimed	
S008641	Humboldt	TOUBEY LOVEJOY SPRING	EEL RIVER	CALIF DEPT OF PARKS & RECREATION	Corporation	417384	Claimed	
S013371	Humboldt	COON CREEK	EEL RIVER	CALIF DEPT OF PARKS & RECREATION	Corporation	417384	Claimed	
S013373	Humboldt	UNCR	EEL RIVER	CALIF DEPT OF PARKS & RECREATION	Corporation	417384	Claimed	
S013370	Humboldt	CABIN CREEK	EEL RIVER	CALIF DEPT OF PARKS & RECREATION	Corporation	417384	Claimed	
S008651	Humboldt	NORTH CREEK	EEL RIVER	CALIF DEPT OF PARKS & RECREATION	Corporation	417384	Claimed	
S008650	Humboldt	CAMPFIRE CENTER SPRING	EEL RIVER	CALIF DEPT OF PARKS & RECREATION	Corporation	417384	Claimed	
S008648	Humboldt	OAK FLAT SPRING	EEL RIVER	CALIF DEPT OF PARKS & RECREATION	Corporation	417384	Claimed	
S013374	Humboldt	ALBEE CREEK	EEL RIVER	CALIF DEPT OF PARKS & RECREATION	Corporation	417384	Claimed	
S008649	Humboldt	DURPHY CREEK	EEL RIVER	CALIF DEPT OF PARKS & RECREATION	Corporation	417384	Claimed	
S017518	Humboldt	Unnamed	EEL RIVER	CARL A ANDERSON	Individual	533284	Claimed	
S016931	Humboldt	CHINA CREEK	EEL RIVER	CHARLES LIPHART	Individual	523770	Claimed	
S014965	Humboldt	UNSP	EEL RIVER	CHRISTOPHER H TROTH	Individual	438367	Claimed	
S013177	Humboldt	SOUTH FORK SALMON CREEK UNDERFLOW	EEL RIVER	CONSUELO M EVANS	Individual	536462	Claimed	
S008293	Humboldt	UNSP	EEL RIVER	DARRELL FURTADO	Individual	409989	Claimed	

Eel Sr Water Rights

1	2	3	4	5	6	7	8	9
S015186	Humboldt	MARSHALL CREEK	EEL RIVER	DENNIS ORCHID	Individual	443180	Claimed	
S019887	Humboldt	Eel River	EEL RIVER	DIAMOND R RANCH, A CALIFORNIA CORPORATION	Corporation	435808	Claimed	
S016155	Humboldt	SOUTH FORK EEL RIVER	EEL RIVER	DONALD COURTEMANCHE	Individual	505840	Claimed	
S021493	Humboldt	Unnamed Tributary	EEL RIVER	DONALD L ERICKSON	Individual	535904	Claimed	
S021334	Humboldt	Unnamed Tributary	EEL RIVER	DONALD L ERICKSON	Individual	535904	Claimed	
S021332	Humboldt	Unnamed Tributary	EEL RIVER	DONALD L ERICKSON	Individual	535904	Claimed	
S021333	Humboldt	Unnamed Tributary	EEL RIVER	DONALD L ERICKSON	Individual	535904	Claimed	
S019430	Humboldt		EEL RIVER	E.R. CONNICK TRUST	Trust	531176	Claimed	
S018598	Humboldt		EEL RIVER	EATON ROUGHS LAND PARTNERSHIP	Partnership or Co-owners	530815	Claimed	
S020106	Humboldt		EEL RIVER	ELLEN D WARNER	Individual	531671	Claimed	
S017690	Humboldt	Carter Creek	EEL RIVER	FORT BAKER RANCH COMPANY	Corporation	533226	Claimed	
S017693	Humboldt	Dairy Creek	EEL RIVER	FORT BAKER RANCH COMPANY	Corporation	533226	Claimed	
S017682	Humboldt	Unnamed Stream	EEL RIVER	FORT BAKER RANCH COMPANY	Corporation	533226	Claimed	
S017676	Humboldt	Unnamed Stream	EEL RIVER	FORT BAKER RANCH COMPANY	Corporation	533226	Claimed	
S017696	Humboldt	Unnamed Stream	EEL RIVER	FORT BAKER RANCH COMPANY	Corporation	533226	Claimed	
S017679	Humboldt	Unnamed Stream	EEL RIVER	FORT BAKER RANCH COMPANY	Corporation	533226	Claimed	
S021494	Humboldt	China Creek	EEL RIVER	FRANK CANNING	Individual	536357	Claimed	
S021564	Humboldt		EEL RIVER	GARY W BELLI	Individual	427655	Claimed	
S017408	Humboldt	Unnamed Stream	EEL RIVER	HANSEN-DEGNAN PROPERTIES INC	Corporation	532966	Claimed	
S017410	Humboldt	Unnamed Stream	EEL	HANSEN-DEGNAN	Corporation	532966	Claimed	

Eel Sr Water Rights

1	2	3	4	5	6	7	8	9
			RIVER	PROPERTIES INC				
S017407	Humboldt	Unnamed Stream	EEL RIVER	HANSEN-DEGNAN PROPERTIES INC	Corporation	532966	Claimed	
S017404	Humboldt	Unnamed	EEL RIVER	HANSEN-DEGNAN PROPERTIES INC	Corporation	532966	Claimed	
S017419	Humboldt	Unnamed	EEL RIVER	HANSEN-DEGNAN PROPERTIES INC	Corporation	532966	Claimed	
S017401	Humboldt	Unnamed	EEL RIVER	HANSEN-DEGNAN PROPERTIES INC	Corporation	532966	Claimed	
S017413	Humboldt	Unnamed Stream	EEL RIVER	HANSEN-DEGNAN PROPERTIES INC	Corporation	532966	Claimed	
S017416	Humboldt	Unnamed	EEL RIVER	HANSEN-DEGNAN PROPERTIES INC	Corporation	532966	Claimed	
S021750	Humboldt	Yager Creek	EEL RIVER	HUMBOLDT REDWOOD COMPANY LLC	Limited Liability Company	536613	Claimed	
S021747	Humboldt	Eel River	EEL RIVER	HUMBOLDT REDWOOD COMPANY LLC	Limited Liability Company	536613	Claimed	
S021753	Humboldt	Weber Creek	EEL RIVER	HUMBOLDT REDWOOD COMPANY LLC	Limited Liability Company	536613	Claimed	
S021748	Humboldt	Scotia Log Pong	EEL RIVER	HUMBOLDT REDWOOD COMPANY LLC	Limited Liability Company	536613	Claimed	
S021755	Humboldt	Bear Creek	EEL RIVER	HUMBOLDT REDWOOD COMPANY LLC	Limited Liability Company	536613	Claimed	
S021745	Humboldt	Larabee Creek	EEL RIVER	HUMBOLDT REDWOOD COMPANY LLC	Limited Partner	536613	Claimed	
S021743	Humboldt	Unnamed Pond	EEL RIVER	HUMBOLDT REDWOOD COMPANY LLC	Limited Liability Company	536613	Claimed	
S021742	Humboldt	Eel River	EEL RIVER	HUMBOLDT REDWOOD COMPANY LLC	Limited Liability Company	536613	Claimed	
S021749	Humboldt	Van Duzen River	EEL RIVER	HUMBOLDT REDWOOD COMPANY LLC	Limited Liability Company	536613	Claimed	
S021746	Humboldt	Eel River	EEL RIVER	HUMBOLDT REDWOOD COMPANY LLC	Limited Liability	536613	Claimed	

Eel Sr Water Rights

1	2	3	4	5	6	7	8	9
					Company			
S017363	Humboldt	Unnamed	EEL RIVER	HUNT FAMILY RANCH PARTNERSHIP	Corporation	533380	Claimed	
S017369	Humboldt	Unnamed	EEL RIVER	HUNT FAMILY RANCH PARTNERSHIP	Corporation	533380	Claimed	
S017381	Humboldt	Unnamed	EEL RIVER	HUNT FAMILY RANCH PARTNERSHIP	Corporation	533380	Claimed	
S016758	Humboldt	Unnamed Stream	EEL RIVER	JOMRA KAN	Individual	533073	Claimed	
S018301	Humboldt	Unnamed	EEL RIVER	JOSEPH JOE RUSS IV	Individual	433724	Claimed	
S018304	Humboldt	Unnamed	EEL RIVER	JOSEPH JOE RUSS IV	Individual	433724	Claimed	
S015054	Humboldt	THOMPSON CREEK	EEL RIVER	JOSH WALDROP	Individual	523280	Claimed	
S021338	Humboldt	Unnamed Creek	EEL RIVER	JURGEN GIESSEL	Individual	535909	Claimed	
S021337	Humboldt	Jewett Creek	EEL RIVER	JURGEN GIESSEL	Individual	535909	Claimed	
S019420	Humboldt	Van Duzen River	EEL RIVER	KEVIN EARL CUNNINGHAM	Individual	531165	Claimed	
S020079	Humboldt	Larabee Creek	EEL RIVER	LARABEE RANCH HOLDINGS LLC	Limited Liability Company	532233	Claimed	
S020088	Humboldt	Larabee Creek	EEL RIVER	LARABEE RANCH HOLDINGS LLC	Limited Liability Company	532233	Claimed	
S021498	Humboldt	Unnamed Creek	EEL RIVER	LARRY RUSSEL WISBY	Individual	536360	Claimed	
S021566	Humboldt	Eel River	EEL RIVER	LINETTE M BOURASSA	Individual	536391	Claimed	
S012326	Humboldt	THOMPSON CREEK	EEL RIVER	LOREN FURBER	Individual	544014	Claimed	
S018370	Humboldt	Unnamed Tributary	EEL RIVER	MICHAEL L. HOWETH	Individual	534527	Claimed	
S015932	Humboldt	UNNAMED SPRING	EEL RIVER	MICHAEL W DAVIS	Individual	451239	Claimed	
S019207	Humboldt	Unnamed Developed Spring	EEL RIVER	R.H. EMMERSON & SONS	Corporation	531297	Claimed	
S002571	Humboldt	MILL CREEK	EEL	RAY ANZINI	Individual	432126	Claimed	

Eel Sr Water Rights

1	2	3	4	5	6	7	8	9
			RIVER					
S021573	Humboldt	Unnamed Tributary	EEL RIVER	REBECCA M SCALES	Individual	536397	Claimed	
S018707	Humboldt	John's Spring	EEL RIVER	RICHARD CALLAHAN	Individual	531222	Claimed	
S018706	Humboldt	Kristea's Spring	EEL RIVER	RICHARD CALLAHAN	Individual	531222	Claimed	
S000658	Humboldt	HARTSOOK CREEK	EEL RIVER	RICHARDSON GROVE K O A	Corporation	418506	Claimed	
S000145	Humboldt	FRANCIS CREEK	EEL RIVER	ROBERT FIELD	Individual	436768	Claimed	
S018715	Humboldt		EEL RIVER	ROBERT FORTINO	Individual	531237	Claimed	
S018724	Humboldt		EEL RIVER	ROBERT FORTINO	Individual	531237	Claimed	
S018726	Humboldt		EEL RIVER	ROBERT FORTINO	Individual	531237	Claimed	
S018717	Humboldt		EEL RIVER	ROBERT FORTINO	Individual	531237	Claimed	
S018714	Humboldt	Traulsen Creek Underflow	EEL RIVER	ROBERT FORTINO	Individual	531237	Claimed	
S018723	Humboldt		EEL RIVER	ROBERT FORTINO	Individual	531237	Claimed	
S018721	Humboldt		EEL RIVER	ROBERT FORTINO	Individual	531237	Claimed	
S018720	Humboldt		EEL RIVER	ROBERT FORTINO	Individual	531237	Claimed	
S018719	Humboldt		EEL RIVER	ROBERT FORTINO	Individual	531237	Claimed	
S018718	Humboldt		EEL RIVER	ROBERT FORTINO	Individual	531237	Claimed	
S018722	Humboldt		EEL RIVER	ROBERT FORTINO	Individual	531237	Claimed	
S018728	Humboldt		EEL RIVER	ROBERT FORTINO	Individual	531237	Claimed	
S018725	Humboldt		EEL RIVER	ROBERT FORTINO	Individual	531237	Claimed	
S018731	Humboldt		EEL RIVER	ROBERT FORTINO	Individual	531237	Claimed	
S018732	Humboldt		EEL RIVER	ROBERT FORTINO	Individual	531237	Claimed	

Eel Sr Water Rights

1	2	3	4	5	6	7	8	9
			RIVER					
S018727	Humboldt		EEL RIVER	ROBERT FORTINO	Individual	531237	Claimed	
S018730	Humboldt		EEL RIVER	ROBERT FORTINO	Individual	531237	Claimed	
S018716	Humboldt		EEL RIVER	ROBERT FORTINO	Individual	531237	Claimed	
S018729	Humboldt		EEL RIVER	ROBERT FORTINO	Individual	531237	Claimed	
S018713	Humboldt	Traulsen Creek	EEL RIVER	ROBERT FORTINO	Individual	531237	Claimed	
S018711	Humboldt	Traulsen Creek Underflow	EEL RIVER	ROBERT FORTINO	Individual	531237	Claimed	
S018712	Humboldt	Traulsen Creek Underflow	EEL RIVER	ROBERT FORTINO	Individual	531237	Claimed	
S012451	Humboldt	EAGLE CREEK	EEL RIVER	ROBERT MAY	Individual	405590	Claimed	
S016636	Humboldt	Sproul Creek	EEL RIVER	ROBERT AND BARBARA FROEHLICH FAMILY TRUST OF 2002	Trust	532340	Claimed	
S016637	Humboldt	Little Sprowl Creek	EEL RIVER	ROBERT AND BARBARA FROEHLICH FAMILY TRUST OF 2002	Trust	532340	Claimed	
S016978	Humboldt	South Fork Eel River	EEL RIVER	ROBERT S FISHMAN	Individual	532842	Claimed	
S009763	Humboldt	CONNICK CREEK	EEL RIVER	ROBIN C BROOKS	Individual	427530	Claimed	
S021359	Humboldt	Eel River	EEL RIVER	RODNEY PETER HUNTER	Individual	535943	Claimed	
S019521	Humboldt	Unnamed	EEL RIVER	RUSS RANCH AND TIMBER COMPANY	Corporation	531909	Claimed	
S019527	Humboldt	Unnamed	EEL RIVER	RUSS RANCH AND TIMBER COMPANY	Corporation	531909	Claimed	
S022738	Humboldt	Redwood Creek	EEL RIVER	RUSSELL DOBSON	Individual	541258	Claimed	
S009594	Humboldt	UNSP	EEL RIVER	THEODORE ALLEN DUEY	Individual	415612	Claimed	
S015405	Humboldt	DEAN CREEK	EEL RIVER	THOMAS CHRISTMAN	Individual	436343	Claimed	
S003169	Humboldt	LITTLE SALMON	EEL	TOSTEN RANCH	Corporation	411357	Claimed	

Eel Sr Water Rights

1	2	3	4	5	6	7	8	9
		CREEK	RIVER					
S003168	Humboldt	LITTLE SALMON CREEK	EEL RIVER	TOSTEN RANCH	Corporation	411357	Claimed	
S007926	Humboldt	UNSP	EEL RIVER	U S SIX RIVERS NATL FOREST	Corporation	405189	Claimed	

Senior Water Rights Holders

7-11-14
from SWQRI

Application Number	Face Value (acre-feet)	Primary Owner
S003150	0.1	LYMAN JEWETT 1999 TRUST
S003151	0.048	LYMAN JEWETT 1999 TRUST
S003152	0.1	LYMAN JEWETT 1999 TRUST
S003153	0.1	LYMAN JEWETT 1999 TRUST
S003583	0.0184	U S MENDOCINO NATL FOREST
S003613	0.037	U S MENDOCINO NATL FOREST
S003614	0.055	U S MENDOCINO NATL FOREST
S004704	69	PACIFIC GAS AND ELECTRIC COMPANY
S010590	154.98	TOM BENNINGHOVEN
S015882	0.1	CAROL TTEES
S018301	13.7	JOSEPH RUSS IV
S018304	15.3	JOSEPH RUSS IV
S019138	415.9	DELIA RODRIGUEZ
S019521	3.2	RUSS RANCH AND TIMBER COMPANY
S019527	3.2	RUSS RANCH AND TIMBER COMPANY
S021573	0.1	REBECCA SCALES
S021580	0.112	ANDREW ANDY WESTFALL
S000775	0	CAROL TTEES
S000016	0	TAWNY ARNDS
S001010	191900	PACIFIC GAS AND ELECTRIC COMPANY
S001452	1	BOB MORRIS
S002617	0.052	RICHARD DREWRY
S005003	3	CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
S008123	297	LAKE PILLSBURY PROPERTY WATER CO
S009524	0.023	MARGE TODD
S009903	10	MACADAM BLACK
S013199	1.2	GLENN FORD
S018711	18.39	ROBERT FORTINO
S018712	11.42	ROBERT FORTINO
S018713	34.73	ROBERT FORTINO
S018714	4.15	ROBERT FORTINO
S018715	0.51	ROBERT FORTINO
S018716	0.85	ROBERT FORTINO
S018717	2	ROBERT FORTINO
S018718	4.65	ROBERT FORTINO
S018719	4.65	ROBERT FORTINO
S018720	4.63	ROBERT FORTINO
S018721	4	ROBERT FORTINO
S018722	0.9	ROBERT FORTINO
S018723	3.9	ROBERT FORTINO

S018724	0.7	ROBERT FORTINO
S018725	5.8	ROBERT FORTINO
S018726	5.8	ROBERT FORTINO
S018727	5.8	ROBERT FORTINO
S018728	5.8	ROBERT FORTINO
S018729	40	ROBERT FORTINO
S018730	9.4	ROBERT FORTINO
S018731	8.2	ROBERT FORTINO
S018732	12.8	ROBERT FORTINO
S020060	0.9	ALBERT STOCKTON
S021564	4.5	GARY BELLI
S023314	0	ROBERT MORRIS
S000145	0.0004	ROBERT FIELD
S001049	0.865	WILLIAM BERTRAM
S001463	10	ANGELA GRANT
S002571	0.479	RAY ANZINI
S002828	0.166	SUSAN CLARK
S003141	0.0184	LYMAN JEWETT 1999 TRUST
S003142	0.0184	LYMAN JEWETT 1999 TRUST
S003143	0.0184	LYMAN JEWETT 1999 TRUST
S003144	0.0184	LYMAN JEWETT 1999 TRUST
S003145	0.0184	LYMAN JEWETT 1999 TRUST
S003146	0.0184	LYMAN JEWETT 1999 TRUST
S003147	0.0184	LYMAN JEWETT 1999 TRUST
S003148	0.0184	LYMAN JEWETT 1999 TRUST
S003149	0.0184	LYMAN JEWETT 1999 TRUST
S003585	0.276	U S MENDOCINO NATL FOREST
S003586	0.086	U S MENDOCINO NATL FOREST
S003617	0.012	U S MENDOCINO NATL FOREST
S003620	0.039	U S MENDOCINO NATL FOREST
S003634	0.002	U S MENDOCINO NATL FOREST
S003636	0.25	U S MENDOCINO NATL FOREST
S003643	0.025	U S MENDOCINO NATL FOREST
S003653	0.046	U S MENDOCINO NATL FOREST
S004009	0.282	U S SIX RIVERS NATL FOREST
S004899	0.0184	U S MENDOCINO NATL FOREST
S005026	0.11	U S MENDOCINO NATL FOREST
S005291	0.008	CHERYL BRANSON
S007868	0	JERRY MILLER
S008566	1.9	JOAN TORREANO
S009290	0.002	HENRY FIELDS

S009633	0.552	PAULINE SANDERSON
S009999	0.008	MARY MARCH
S012451	0.0184	ROBERT MAY
S012972	6.555	GREG BIAGI
S013104	4986	NORMAN BURGESS
S013198	0	SAMUEL SNIDER
S013710	0.028	BARBARA DEAN
S013728	0.1	LYMAN JEWETT 1999 TRUST
S013980	4371	NORMAN BURGESS
S013981	3375	NORMAN BURGESS
S013982	477	NORMAN BURGESS
S014167	0.672	GLORIA BROWN
S015244	0.029	SAMUEL EDWARDS
S015802	0	JAMES GAYNER
S015932	0.3	MICHAEL DAVIS
S016100	61	MICHAEL ROMER
S016274	0.3	STEPHANIE WHEELER
S016858	0.3	DENNIS ROGERS
S016859	62.1	LAKE PILLSBURY PROPERTY OWNERS ASSOCIATION
S017019	11.1	ED LEWIS
S017679	4	FORT BAKER RANCH COMPANY
S017690	1	FORT BAKER RANCH COMPANY
S018706	8	RICHARD CALLAHAN
S018707	8	RICHARD CALLAHAN
S018771	0.3	DAVID RUPE
S019430	2.21	E.R. CONNICK TRUST
S019861	0.003	JACK HANSEN
S019887	280	DIAMOND R RANCH, A CALIFORNIA CORPORATION
S020079	85.27	LARABEE RANCH HOLDINGS LLC
S020088	42.4	LARABEE RANCH HOLDINGS LLC
S020117	0.1	JUNE RUCKMAN
S020176	0.1	CASEY PRYOR
S020273	0.1	JON MCKEE
S020446	0	GORDON TOSTEN
S020447	0	GORDON TOSTEN
S020806	0.006	ERIC CHAMPION
S021337	0.3	JURGEN GIESSEL
S021338	0.2	JURGEN GIESSEL
S021355	0.4	MARGIE HANDLEY
S021359	0.3	RODNEY HUNTER
S021474	0.54	CHARLES REAM

S021537	516	TOM BENNINGHOVEN
S021742	1.5	HUMBOLDT REDWOOD COMPANY LLC
S021743	0.8	HUMBOLDT REDWOOD COMPANY LLC
S021745	0.7	HUMBOLDT REDWOOD COMPANY LLC
S021746	1.7	HUMBOLDT REDWOOD COMPANY LLC
S021747	1.3	HUMBOLDT REDWOOD COMPANY LLC
S021748	1.5	HUMBOLDT REDWOOD COMPANY LLC
S021749	0.8	HUMBOLDT REDWOOD COMPANY LLC
S021753	0.5	HUMBOLDT REDWOOD COMPANY LLC
S021755	0.6	HUMBOLDT REDWOOD COMPANY LLC
S021802	0.1	HUMBOLDT REDWOOD COMPANY LLC
S021806	3.5	HUMBOLDT REDWOOD COMPANY LLC
S022311	0.958	GRIST CREEK AGGREGATES, LLC
S023062	0.3	JAMES BIXLER
S023736	0.1	GLENN MELOSH
S023899	0.02456	JAMES BIXLER
S024038	0.3	HUMBOLDT REDWOOD COMPANY LLC
S024039	0.6	HUMBOLDT REDWOOD COMPANY LLC
S024121	0.1	HUMBOLDT REDWOOD COMPANY LLC
S024127	0.4	HUMBOLDT REDWOOD COMPANY LLC
S024211	0	RUDOLPH HECHFELLNER
S004014	0.26	U S SIX RIVERS NATL FOREST
S007937	0.21	U S SIX RIVERS NATL FOREST
S009057	0.00018	BARBARA DEAN
S009058	0.331	BARBARA DEAN
S009059	28.43	BARBARA DEAN
S009060	1.611	BARBARA DEAN
S010818	0.131	U S SIX RIVERS NATL FOREST
S011009	0.197	U S SIX RIVERS NATL FOREST
S013711	0.055	BARBARA DEAN
S015287	5.5	DONALD PARKER
S022042	0.3	RICHARD PIERCE
S022043	0.2	TRAVIS RANCH, LLC
S022070	0.2	TRAVIS RANCH, LLC