

**Response to Written Comments  
Draft Waste Discharge and Water Recycling Requirements  
Order No. R1-2023-0011  
for  
Bodega Bay Public Utility District  
Wastewater Treatment and Reclamation Facility  
WDID No. 1B750280SON**

**Regional Water Quality Control Board, North Coast Region  
June 15 and 16, 2023**

### **Comments Received**

The deadline for submittal of public comments regarding draft Waste Discharge and Water Recycling Requirements for Order No. R1-2023-0011 (Draft Order), for the Bodega Bay Public Utility District (BBPUD), Wastewater Treatment and Reclamation Facility (Facility) was February 27, 2023. Regional Water Board staff (Staff) received no written comments from the Permittee or public regarding the Draft Order's notification period.

Regional Water Board staff communicated with BBPUD during the public comment period to discuss the Draft Order and BBPUD did not identify any significant concerns.

This Response to Comments document includes a summary of staff-initiated changes made to the Draft Order. Text added to the Proposed Order is identified by underline, and text to be deleted from the Proposed Order is identified by strike-through in this document. The term "Draft Order" refers to the version of the order that was sent out for public comment. The term "Proposed Order" refers to the version of the order that has been modified by the staff-initiated changes and is being presented to the North Coast Regional Water Quality Control Board (Regional Water Board) for consideration.

### **Staff Initiated Changes**

The following sections describe changes made to the Draft Order, initiated by Regional Water Board staff to update and provide clarification to the Proposed Order. The modified sections are identified by their section numbers as indicated in the Proposed Order. Changes that were editorial in nature are not reflected below. Regional Water Board staff virtually met (or communicated) with BBPUD on April 28, 2023 to discuss the changes made to the Draft Order and BBPUD did not have any objections to the proposed changes.

1. Paragraph eleven of Section II.B of the Proposed Order was modified to identify that The Links at Bodega Harbour golf course is currently enrolled in the State Water Resources Control Board Order WQ 2016-0068-DDW, *Water Reclamation Requirements for Recycled Water Use*, as follows:

This Order includes water recycling requirements that apply to the production, storage, and distribution of tertiary recycled water. The use of recycled water on a privately-owned golf course is permitted through State Water Resources Control Board Order WQ 2016-0068-DDW, *Water Reclamation Requirements for Recycled Water Use* (Recycled Water General Order). The LBH golf course submitted a Notice of Intent (NOI) on November 8, 2017 to obtain coverage under the Recycled Water General Order. ~~but have not yet been enrolled~~ Regional Water Board staff expect to complete the process to enroll the LBH golf course in the Recycled Water General Order by June 30, 2023.

2. Section II.M of the Proposed Order was modified to remove duplicative language, as follows:

The Regional Water Board has notified the Discharger and interested agencies and persons of its intent to prescribe WDRs for the discharge and has provided them with an opportunity to submit their written comments and recommendations. ~~The prescription of WDRs is not expected to result in a disproportionate impact to a tribal or disadvantaged community based on the nature and characteristics of the discharge, including its location.~~

3. Section VIII.D of the Proposed Order was modified to add language concerning the Discharger's continuation of existing regulatory coverage under Order 2022-0103-DWQ, as follows:

On May 2, 2006, the State Water Board adopted State Water Board Order No. 2006-0003-DWQ, Statewide General WDRs for Sanitary Sewer Systems. Order No. 2006-0003-DWQ requires that all public agencies that currently own or operate sanitary sewer systems apply for coverage under the General WDRs by November 2, 2006. On September 9, 2013, the State Water Board adopted Order No. WQ-2013-0058-EXEC amending Monitoring and Reporting Program for Statewide General Waste Discharge Requirements for Sanitary Sewer Systems. The Discharger shall apply for coverage under Order Nos. 2006-0003-DWQ and WQ-2013-0058-EXEC and any future revisions thereto for operation of its wastewater collection system.

On December 6, 2022, the State Water Board adopted State Water Board Order No. 2022-0103-DWQ, Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems. Order No. 2022-0103-DWQ requires that all public agencies that currently own or operate sanitary sewer systems certify and continue coverage under Order No. 2022-0103-DWQ within 60 days prior to the

effective date of the Order. The Discharger certified the continuation of existing regulatory coverage from Order 2006-0003-DWQ to Order 2022-0103-DWQ on April 5, 2023.