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## North Coast Regional Water Quality Control Board

**TO:** Pat Kaspari, General Manager  
McKinleyville Community Services District  
1656 Sutter Road  
McKinleyville, CA 95519  
Email: [pkaspari@mckinleyvillecsd.com](mailto:pkaspari@mckinleyvillecsd.com)

**FROM:** Tina Low, P.E., Water Resource Control Engineer  
North Coast Regional Water Quality Control Board

**DATE:** December 18, 2024

**SUBJECT:** Initial Study and Proposed Mitigated Negative Declaration for the  
McKinleyville Community Services District Wastewater Recycling  
Expansion Project

On November 19, 2024, the North Coast Regional Water Quality Control Board (Regional Water Board) received notice of the Initial Study and Proposed Mitigated Negative Declaration (IS/Proposed MND) for the McKinleyville Community Services District (McKinleyville CSD) Wastewater Recycling Project (Project). The Project proposes to extend McKinleyville CSD's existing recycled water use by expanding the infrastructure to irrigate additional areas via flood cells. The Project includes installation of flood cells, new and replacement recycled water pipelines, and recycled water application on 132 acres of pasture lands.

We appreciate the opportunity to review the IS/ Proposed MND and have the following comments:

- 1) Regional Water Board Recycled Water Permitting:**  
The State and Regional Water Boards regulate the production and use of recycled water in a manner that protects public health and the environment. Recycled water must be produced and used in compliance with the [Recycled Water Policy](#), California Code of Regulations, title 22 and all applicable state and federal water quality laws.
- 2) Section 4.10 Hydrology and Water Quality:**  
The Recycled Water Policy states that irrigation and other non-potable uses of recycled water, when in accordance with the policy, is to the benefit of the people of the State of California and that nonetheless, such use may impact groundwater quality. To minimize threats to groundwater quality, the Project should be designed to meet the following criteria:

**a. Recycled Water Application Rates:**

In all areas that receive recycled water (including the proposed flood cells), application of recycled water rates must be managed to minimize percolation of recycled water below the plants' root zone, i.e., in a manner (1) necessary to satisfy the plants' evapotranspiration requirements; (2) that considers allowances for supplemental water, irrigation uniformity, leaching, and climate; and (3) when the soil is not saturated. Hydraulic loading to use sites shall be at reasonable agronomic rates designed to minimize percolation of wastewater constituents below the root zone.

**b. Nutrient Management:**

The application of recycled water should also consider the nutrient levels in the water and the nutrient demands of the plants. To minimize nutrient loading to groundwater, recycled water must be applied at rates that do not exceed the water or nutrient demand of the crop or vegetation being irrigated.

We are providing these comments to help inform planning of the Project. If you have any questions regarding these comments, please contact me at (707)-576-2653 or email [Tina.Low@waterboards.ca.gov](mailto:Tina.Low@waterboards.ca.gov).

Best regards,

Tina Low, P.E.  
Water Resource Control Engineer

cc:

Kerry McNamee, Environmental Planner, GHD  
Email: [Kerry.mcnamee@ghd.com](mailto:Kerry.mcnamee@ghd.com)

State Clearinghouse, Office of Planning and Research  
[State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

North Coast Regional Water Quality Control Board  
[Northcoast@waterboards.ca.gov](mailto:Northcoast@waterboards.ca.gov)