



959 South Coast Drive
Suite 315
Costa Mesa
California 92626
Office 714.352.7750
Fax 714.352.7765
www.percwater.com

Via Email: commentletters@waterboards.ca.gov

May 27, 2014

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 "I" Street, 24th Floor
Sacramento, California 95814



Subject: Comment Letter – General Order WDRs for Recycled Water Use

Dear Ms. Townsend:

We have reviewed the draft General Order for Recycled Water Use (“General Order”) and offer the comments below for consideration to the final General Order by the State Water Resources Control Board at its June 3, 2014 public meeting. We applaud Governor Brown and the State Water Resources Control Board (“State Board”) for implementing measures over the past year, including this General Order and financial incentives for recycled water, in an effort to produce a reliable, drought-free, new supply of water.

Our firm’s comments are themed on maximizing the use of recycled water as a reliable supply of water in California, and we whole-heartedly support recycled water projects that result in discontinuing the discharge of a valuable resource to the ocean and saline bays. With that in mind, we request the State Board amend Section 10 of the General Order to allow groundwater replenishment as an authorized activity under the General Order, as groundwater replenishment offers many drought-relief benefits, without limitation:

- Indirectly establishes a new supply of water by replenishing groundwater supplies;
- A cost effective and dependable method of storing recycled water for reuse;
- The marginal cost of treatment for groundwater replenishment is more competitive to ratepayers than other alternative water supply projects, e.g. ocean desalination;
- Creates more “local” water independence for dischargers, thereby reducing the need to continually import higher volumes of potable water supplies;
- Eliminates discharges to the ocean and saline bays;
- Reduces seawater intrusion, thereby further protecting groundwater supplies;
- Eliminates, defers or redirects the cost of upgrading many aging ocean outfalls;
- Safely replenish groundwater supplies through the use of readily available advanced treatment technologies, resulting in a proven method to store and reuse water, and indirectly freeing-up potable water supplies for a higher and better use;

- In amending Section 10, specific reference should be made to including groundwater replenishment projects that would benefit the State's agriculture industry, which provides 12% of the food for the entire country. With the continued drought conditions worsening, farmers need to rely more heavily on local water sources; hence providing a readily available source of recycled water for the agriculture community is critical; and
- Citing Heal the Ocean's "*California Ocean Wastewater Discharge; Report and Inventory*" dated March 15, 2010 there is a daily discharge of 1.35 billion gallons of treated wastewater to the ocean from over 40 wastewater treatment plants. This represents 1.5 million acre-feet per year of lost water resources, which could be readily treated to an advanced level and returned to the State's groundwater basins for storage and reuse.

Thank you for the opportunity to present the above ideas and comments to you for consideration. Hopefully this information is beneficial to you and the State Board as it considers the General Order. We hope to attend the State Board meeting on June 3rd and will be available to answer any questions or provide further input.

Feel free to call me on 949-375-4892 with any questions.

Sincerely,

PERC Water Corporation



Brian D. Cullen
President