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March 27, 2007

Via E-mail & U.S. Mail

Tam M. Doduc, Chair, and Members  
State Water Resources Control Board  
Attention: Song Her, Clerk to the Board ([commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov))  
P. O. Box 100  
Sacramento, CA 95812

Re: Proposed Development of a Statewide Policy for Water Recycling

Dear Chair Doduc and Members of the Board:

Eastern Municipal Water District (EMWD) appreciates the opportunity to provide our comments and recommendations on this very important issue of regulating recycled water in our State. We attended your workshop on March 20, 2007 and we understand that the State is considering the development of a recycled water policy to provide direction to the Regional Boards, in hopes of providing consistent and uniform interpretation of the regulatory framework as recommended by the California Recycled Water Taskforce. We support the development of this policy with some concerns that are discussed below.

EMWD currently provides potable water and water reclamation services to an exponentially growing population of 650,000 people in a service area of 550 square miles. Approximately 65% of the 46 MGD of recycled water that is produced by our four wastewater treatment plants is reused; this represents about 26,000 acre-feet or **5% of the State's recycled water supply**. EMWD has a mature recycled water program that dates back to the first deliveries in the 1960's. On the onset, the primary recycled water users were agricultural properties; however, today the agricultural properties are quickly being replaced with residential and commercial property, thereby changing EMWD's customer base. EMWD has mapped and projected the growth, changes in customer type, now and in the future, and has developed a comprehensive capital improvement program to meet the recycled water demands in the next 25 years. EMWD has invested approximately \$134 million in the infrastructure of the recycled water system. In the next five years, EMWD has committed to invest an additional \$19 million towards system improvements along with significant financial support from Federal and State loans and grant programs.

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As the provider of both water and water reclamation services to western Riverside County, EMWD has the ability to effectively manage the groundwater basins within our District boundaries. This has been done and documented in EMWD's Urban Water Management Plan. As stated in your regulation, the State needs to promote water reuse in order to meet the ever increasing demands on water. EMWD has fully embraced this concept in our management plan. Recycled water is a viable alternative water source for EMWD and is an integral component in our overall plan of service. EMWD has been able to reduce the amount of imported water requirements and over-drafting of groundwater basins from well production by promoting reuse for non-potable services.

The proposal you are considering has great relevance to EMWD's reclamation program. EMWD does straddle two regional board jurisdictions, and we have experienced the different interpretation of regulations from the two boards. We strongly support your intent to provide some consistency across the regional boards. However, any effort to make a consistent recycled water policy must not impede all of our efforts or render our investments in providing recycled water meaningless.

As you are aware, the Santa Ana Regional Board has done an extensive evaluation to amend their basin plan for total dissolved solids and nutrients. EMWD participated in this effort that resulted in new water quality objectives for our basins. Yet, the basin plan includes the flexibility of regional solutions and the creation of groundwater management zones to balance the varying potable water and recycled water qualities to attain water quality objectives; this includes the use of the maximum benefit approach when appropriate. This approach is essential as the imported source water quality can exceed the basin water quality objectives, and it is the only source of potable water serving that region. We have found the overall approach by the Santa Ana Regional Board to be successful and it provides the proper balance between environmental protection of beneficial uses and recycled water reuse promotion.

We are interested and respectfully request to be an active participant in the development of this very important policy. As was apparent in the March 20<sup>th</sup> workshop, there are differing thoughts on what needs to be included in this policy. We are interested in a policy that resolves issues so that recycled water is a sustained, viable, alternative water source, and the beneficial use of our groundwater basins are protected. Thank you for the opportunity to comment, if you have any questions, please feel free to contact myself at (951) 928-6109 or Jayne Joy at (951) 928-3777 X6241.

Sincerely,



A. J. Pack  
General Manager

Copy: Celeste Cantu, General Manager, SAWPA  
Board of Directors