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October 23, 2007

Tam M. Doduc, Chair, and Members
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812
Attn: Jeanine Townsend, Acting Clerk to the Board
(commentletters@waterboards.ca.gov)

Re: State Water Resources Control Board's Proposed Water Recycling Policy

Dear Ms. Doduc and Members of the Board:

Eastern Municipal Water District (EMWD) appreciates the opportunity to provide our comments on the State Water Resources Control Board's proposed statewide Water Recycling Policy. We are in agreement and support the State's goal to establish more uniform requirements for recycled water projects, and agree that recycled water is a major source of water supply in California and a major component in California's plan for meeting the State's growing water demand. In light of the new development of the potential limitations on the availability of imported water and energy requirement to pump imported water, this policy is timely in its promotion of recycled water as a viable alternative water supply that can reduce the demand for imported water that in turn corresponds to reduction in greenhouse gas emissions. Another benefit from recycled water reuse experienced by EMWD is a reduction in over-drafting of groundwater basins from well production by promoting reuse for non-potable uses.

As included in our comment letter dated March 27, 2007 and restated here, 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

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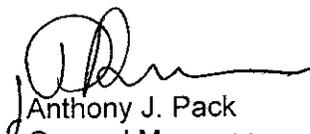
system. In the next five years, EMWD has committed to invest an additional \$19 million towards system improvements along with significant financial support from Federal and State loans and grant programs. As the provider of both water and water reclamation services to western Riverside County, EMWD 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 a special district that falls under the jurisdiction of two regional boards, we have direct experience with being regulated by two different interpretations of recycled water regulations. Santa Ana Regional Board has a comprehensive salt and nutrient management program as part of their basin plan that includes the flexibility of regional solutions for meeting water quality objectives and the use of the maximum benefit approach when appropriate. In contrast, the San Diego Regional Board only allows reuse when recycled water meets or exceeds the water quality objectives, and has not approved any maximum benefit analyses or offset programs within their region. EMWD's mature, successful recycled water program described earlier is located under the authority of Santa Ana Regional Board and very limited reuse occurs under the authority of the San Diego Regional Board. We strongly support your intent to provide guidance to the regional boards to create consistency for recycled water programs.

At the Southern California Water Dialogue meeting on September 26, 2007, Board Member Frances Spivy-Weber mentioned that the Santa Ana Regional Board's salt and nutrient management plan included in their basin plan met the requirements and expectations of the proposed State's policy. We applaud and were greatly encouraged by this statement. We are confident that our recycled water program is comprehensive and protects the beneficial uses within our watershed. The financial and resource investments made by EMWD for their program have been significant. In addition, EMWD has made commitments for additional facilities identified in our plans and maximum benefit proposals based on being able to operate under the auspice of the Santa Ana Regional Board basin plan. We support the proposed policy as long as it recognizes the technically sound and extensive work that has been done in the Santa Ana Region.

In addition, EMWD agrees and supports the comments and recommendations that have been provided by WateReuse, and Association of California Water Agencies, California Association of Sanitation Agencies and the Santa Ana Watershed Project Authority. 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,


Anthony J. Pack
General Manager

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