



Santa Ana Watershed Project Authority

12/4/07 Bd. Mtg.
Water Recycling Policy
Deadline: 10/26/07 by Noon

LATE COMMENT

October 24, 2007



Ron Sullivan
Commission
Chair

Ms. Tam Doduc, Chairperson
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Celeste Cantú
General
Manager

Subject: Statewide Water Recycling Policy

Dear Ms. Doduc.

Eastern
Municipal
Water
District

On December 22, 2004, the State approved a landmark Basin Plan Amendment for the Santa Ana Regional Water Quality Control Board (RWQCB) for nitrogen and TDS in the Santa Ana Region which evaluated the salt impacts on groundwater resources, increased water recycling opportunities and other water management strategies in the watershed. The Basin Plan Amendment was the culmination of the work of the Santa Ana Watershed Project Authority (SAWPA) along with RWQCB staff and over 20 water supply, water recycling, and groundwater management agencies in the Santa Ana Watershed. As administrator for the Nitrogen and TDS Task Force, SAWPA has reviewed the Draft SWRCB Water Recycling Policy. The Task Force is supportive of the goals of the new policy as stated in the draft policy recitals to maximize water recycling throughout the State, particularly as existing water supplies become further threatened by continuing drought conditions and climate change trends. Recycled water will play a key role in augmenting existing and future water supplies as well as replacing potable water for irrigation demands.

Inland
Empire
Utilities
Agency

Orange
County
Water
District

In review of the Draft SWRCB Water Recycling Policy language, we recommend changes to Item 6 and Item 16 of the Resolution shown on page 4 and 6, respectively. Under Item 6, the policy directs Regional Boards to adopt an implementation plan to address groundwater basins which are threatened to exceed groundwater basin objectives because of salt. Since the Santa Ana RWQCB, working with local agencies, has already gone through an extensive nine-year planning process which led to a Regional Board Basin Plan Amendment to accomplish an implementation plan that meets these same requirements, we request that the Santa Ana RWQCB be exempted from this requirement of the policy since it has already complied with it. Further we recommend that the language of this item be modified such that the Regional Boards are encouraged to engage in a collaborative and integrated planning process with local agencies within their regions rather than requiring regional boards to conduct this planning effort entirely on their own.

San
Bernardino
Valley
Municipal
Water
District

Western
Municipal
Water
District

Under Item 16 on page 6 of the policy, we recommend that this sentence be expanded to clarify the use of recycled water for groundwater recharge and reuse as defined under State Board Resolution No. 68-16. Though implicit to some, State Board Resolution No. 68-16 provides opportunities to expand the use of recycled water and manage water resources through the use of groundwater basin assimilative capacity and State approved maximum benefit demonstrations even when quality considerations of recycled water may appear to be in conflict with existing Basin Plan groundwater objectives. The basin plan amendment for TDS and nitrogen approved by the Santa Ana RWQCB and the SWRCB in 2004 thoroughly examined existing State water recycling policy, the Porter-



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Cologne Water Quality Control Act, existing Basin Plan requirements and State Board Resolution No. 86-16 demonstrated that through appropriate water resource management strategies, many of which include the recharge of recycled water, adequate protection of beneficial uses can be assured.

As the SWRCB embarks upon a new effort to establish a statewide policy for water recycling, it is our hope through this policy development that approved State demonstrations of maximizing water recycling are incorporated into the new policy so that current water recycling planning and projects in the Santa Ana region and across the State may continue and expand to meet the state's growing water demand.

Sincerely,



Mark Norton, P.E.
Water Resources & Planning Manager