



WATERREUSE
ASSOCIATION

Tri-TAC
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League of California Cities
California Association of Sanitation Agencies
California Water Environment Association

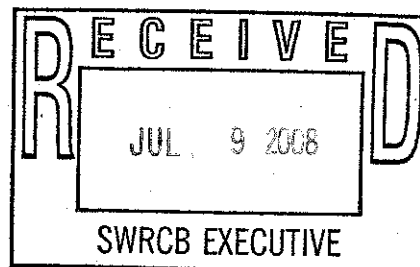
Reply to: 813 Sixth Street, 3rd Floor
Sacramento, CA 95814
(916) 446-7979, ext. 307

July 9, 2008

Tam Doduc, Chair, and Members
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812

Attention: Jeanine Townsend, Clerk to the Board

Via Electronic and U.S Mail



Re: Comments on the June 2008 Draft Strategic Workplan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary

Dear Chair Doduc and Members of the Board:

The California Association of Sanitation Agencies (CASA), the California Section of the WaterReuse Association (WaterReuse), and Tri-TAC appreciate this opportunity to provide the following comments on the State Water Resources Control Board's (State Water Board) *June 2008 Draft Strategic Workplan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary* (Draft Workplan).

The Draft Workplan covers a number of elements including water use efficiency. While we concur with the State Water Board's assessment that California must increase the use of recycled water to ensure that the State's water resources will be sufficient to satisfy future demands, we are concerned about the proposed uniform standard for water recycling, which would require all wastewater treatment plants located in areas using imported water supplies to recycle at least 25 percent of their wastewater by the year 2020. While laudable in its intent to stretch existing potable supplies, imposing this uniform requirement categorically on wastewater agencies fails to take into account the numerous local factors that affect the feasibility of recycled water.

Among the many local factors that should be considered in determining feasibility and amount of recycled water is the need for partnerships between wastewater agencies, which produce recycled water, and water agencies, which purvey water to customers. Other relevant considerations are cost effectiveness, funding availability, and public

perception. Recycled water projects require agency partnerships. A wastewater agency cannot unilaterally implement a recycled water project without consultation, and in some cases, concurrence of, the water agency. Requiring the development of Water Recycling Plans, through the permit renewal cycle, to recycle 25 percent of the wastewater will not be productive because plans themselves do not result in additional water supply. The removal of unnecessary regulatory barriers, State funding assistance, and public education and outreach programs are all needed to increase water recycling in California.

The State Water Board has not articulated a compelling reason that Water Recycling Plans are needed. All water agencies already prepare and submit Urban Water Management Plans (UWMP) every five years to the State (Department of Water Resources). The UWMPs provide information regarding existing amount of recycled water and planned recycled water initiatives. Through the UWMP process, water agencies, in coordination with wastewater agencies, evaluate the feasibility of water recycling and provide information regarding the potential to further increase water recycling.

In addition, the Water Board has approximately 400,000 acre-feet per year of recycled water projects on its existing competitive project list (CPL). These are all projects that have been through planning and environmental reviews that have been approved by Water Board staff. The CPL is prioritized to emphasize benefits to the Bay Delta. Focusing on implementation of these recycled water projects seems like a logical first step before new mandates are created.

In 2003, California's Recycled Water Task Force identified inconsistent and overly burdensome state regulatory requirements as a major barrier to increased use of recycled water. The Task Force also identified the need for additional funding for recycled water projects and research, as well as public outreach and education programs that address public perceptions about water reuse. These are all areas where the Water Board can offer important and effective leadership without introducing new regulatory mandates.

Our Associations firmly believe that Water Board's highest and best role in encouraging water recycling is one of leadership and not one of opportunistic regulation and enforcement. It is not productive to require addition parallel planning exercises by the wastewater agencies when current planning exists and is not being fully leveraged. Instead, the Draft Workplan should call for a collaborative effort that will focus on bringing identified recycled water supplies on line in timely fashion. We recommend that the long-term water recycling activities (July 2010-Ongoing) under Water Use Efficiency be replaced with the following:

Work with recycled water producers, water suppliers, the Department of Water Resources and other stakeholders to review the information contained in the Recycled Water Optimization Plan component of the 2005 Urban Water Management Plans to improve understanding of the amount of water recycling planned over the next 20 years and the obstacles to water recycling, and, by July

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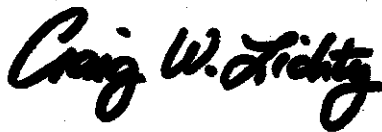
2009, to develop a set of long-term actions to attain the highest practicable amount of water recycling by 2020.

This approach allows the Water Board to work collaboratively to develop locally appropriate actions in response to locally developed plans. This may include new or modified water recycling planning requirements for local agencies or locally appropriate regulatory action, but these are only two of the tools that the Water Board could apply. The Water Board's role in increasing regulatory certainty, providing funding and assisting with public education that could also be employed, where appropriate. We urge the Water Board to emphasize collaboration and leadership before resorting to regulatory authority. To date, every recycled water project in the State has been developed as a result of local initiative and local partnerships. Fostering the development of local projects is the appropriate role of the Water Board.

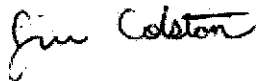
Thank you for providing us with this opportunity to provide comments.

Sincerely,

Roberta Larson, Director of Legal & Regulatory Affairs
CASA



Craig Lichty, President
California Section of WaterReuse



Jim Colston, Chair
Tri-TAC