



San Diego County Water Authority

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December 22, 2017

Laura McLellan

**Division of Water Quality
State Water Resources Control Board**

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Subject: Comment Letter – Proposed Recycled Water Policy Amendment Early Public Consultation

Dear Ms. McLellan:

The San Diego County Water Authority appreciates the opportunity to comment on the scope of the State Water Board’s update to its Recycled Water Policy (Policy). The Water Authority is a wholesale water provider in San Diego County with 24 retail member agencies serving a population of 3.3 million residents. Recycled water has been a key component of the San Diego region’s water supply diversification strategy for more than 25 years. Given recent advances in the science, development and use of recycled water, an update to the Recycled Water Policy is timely. We offer the following recommendations for your consideration as you develop the Policy update and environmental analysis:

Policy should allow permitting flexibility at the local level

The Policy should continue to allow for streamlined permitting of projects at the regional level, even with its goal of statewide consistency. In the San Diego region, recycled water agencies rely on Master Reclamation Permits issued by the San Diego Water Board for recycled water treatment, use, and distribution. Agencies may prefer to remain under one master permit rather than enrolling in a statewide permit that would require additional coverage under separate waste discharge requirements.

Monitoring for CECs should be for information gathering purposes

The Water Authority has been participating as a member of the Stakeholder Advisory Group to the Science Advisory Panel on Constituents of Emerging Concern (CECs). We support the State Water Board’s approach of using an expert panel to recommend monitoring for CECs in potable reuse and recycled water projects. It is our understanding that CEC monitoring for potable reuse projects may be for information gathering purposes to advance the knowledge of treatment processes, improve reliability, and further develop monitoring methods. If monitoring for CECs in potable reuse projects will also be used as the basis for regulatory requirements, then this should be addressed in the analysis.

OTHER REPRESENTATIVE

County of San Diego

A public agency providing a safe and reliable water supply to the San Diego region

SNMPs should be integrated with SGMA and prioritized regionally

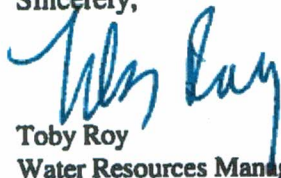
The Policy should be updated to integrate requirements for developing salt and nutrient management plans (SNMPs) into planning required under the Sustainable Groundwater Management Act. The current Policy recognizes that wastewater and recycled water projects represent only a portion of the overall salinity/nutrient loads within a watershed or groundwater basin. However, the development of SNMPs has been the responsibility of recycled water purveyors under permit conditions issued by the San Diego Water Board. We recommend the analysis explore ways to increase engagement of groundwater sustainability agencies to address both water supply and water quality issues. It should be noted that this would require the State Water Board to coordinate with the California Department of Water Resources.

We also recommend that development of SNMPs be prioritized regionally in collaboration with stakeholders. In the San Diego region, the Water Authority worked with the Southern California Salinity Coalition and stakeholders to develop guidelines endorsed by the San Diego Water Board in November 2010. These guidelines established a standardized framework for developing SNMPs based on size, complexity, level of municipal use, and groundwater quality. The environmental analysis should consider that not every basin will require development of SNMPs, such as coastal basins that are naturally high in salt due to seawater intrusion.

The Policy requires SNMPs to include an antidegradation analysis for projects with its plan. In the absence of an SNMP, the Policy allows for the use of interim assimilative capacity criteria to demonstrative project compliance. We support providing additional clarity on how to demonstrate compliance with the Antidegradation Policy in collaboration with the Regional Water Boards, and extending the use of the interim criteria as a long-term strategy.

Thank you for the opportunity to comment on scoping of the Recycled Water Policy update. Please contact Lesley Dobalian, Principal Water Resources Specialist, with any questions at (858) 522-6747 or LDobalian@sdewa.org.

Sincerely,



Toby Roy
Water Resources Manager

Sent electronically to: commentletters@waterboards.ca.gov