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Beaumont-Cherry Valley Water District

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June 25, 2015

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Michael J. Adackapara
Division Chief
Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501-3221

Subject: City of Beaumont
Comments on Draft Discharge Permit Requirements
R8-2015-0026, NPDES CA0105376

Dear Mr. Adackapara:

The Beaumont Cherry Valley Water District (BCVWD or "District") is one of the principal water suppliers in the San Geronio Pass providing water service to over 46,000 people through over 16,000 connections. We serve the residents of the City of Beaumont and the unincorporated community of Cherry Valley. We have both a potable and non-potable water system. Our non-potable water system consists of a looped system of over 25 miles of pipeline around the City of Beaumont.

Our water supply is exclusively groundwater supplemented by imported water from the State Water Project purchased from the San Geronio Pass Water Agency. The imported water is recharged into the Beaumont Management Zone (BMZ), banked and subsequently extracted for use. Over the last seven years, we have extracted an average of 10,388 acre-ft (AF) or about 84% of our supply from the Beaumont Basin and the BMZ. Protecting the aquifer is extremely important to us and is why we offer the following comments on the above referenced draft permit.

Our concerns center on the following:

1. **Protection of Groundwater Quality in the vicinity of Discharge Points DP-007 through DP-013.** The permit allows the discharge of tertiary filtered wastewater with a TDS of 230 mg/L and TIN of 2 mg/L. Nothing addresses the other issues associated with recharge of recycled water.

The discharge at these locations is a planned groundwater recharge project and must not be allowed until advanced wastewater treatment is provided to all of the effluent to minimize the discharge of chemicals of emerging concern and other regulated organics and inorganics. The current proposed treatment process does not provide this level of treatment.

BCVWD has wells master planned in the vicinity of DP-007 through DP-013 based on a recent report prepared the Beaumont Basin Watermaster¹ which identifies this area as having the greatest depth to the bottom of the upper aquifer, the highest hydraulic conductivity, and greatest specific yield among other factors. Discharging of recycled water from the referenced discharge points, without advanced treatment, will severely impact the District's ability to site wells to meet future demands.

- 2. The permit allows the City to provide recycled water to the Oak Valley Greens (R-02) and Tukwet Canyon Golf Courses (R-01).** The District already has a non-potable water pipeline to supply both of these golf courses. The pipeline serving Oak Valley Greens has been in the ground since 2003/04 or so and the Tukwet Canyon Courses since 2006 or so. Having the City of Beaumont provide recycled water to the courses requires the construction of a separate and parallel recycled water pipeline and unnecessary expenditure of public funds. Furthermore it is a duplication of service which will be challenged.

Recycled water has played a major role in the District's water supply portfolio since before Urban Water Management Plans (UWMPs) were required. Our current UWMP and our draft Water Master Plan envisions almost full utilization of the City of Beaumont's recycled water volume. The District has historically identified the City's recycled water as a key component to accommodate the City's planned growth. Our projected non-potable water demands are so large, we prepared a Facilities Plan for a second connection with Yucaipa Valley Water District. This Plan has been approved by the State Board and we are in the process of implementing this project.

The City formed Community Facilities District (CFD) 93-1 in 1993 to fund the installation of infrastructure including potable and non-potable water facilities to serve proposed development planned in the City.

¹ Draft 2013 Reevaluation of the Beaumont Basin Safe Yield prepared for the Beaumont Basin Watermaster by Thomas Harder and Company in association with Alda, Inc., April 2, 2014.

Funds were collected from developers to fund these facilities which included about 25 to 30 miles of non-potable water transmission mains and a 2 million gallon non-potable water storage tank all owned and operated by BCVWD. Current residents are now repaying these CFD, Mello Roos Bonds, through property taxes. The District's non-potable water system has been installed with "purple pipe" and common areas, street medians, new parks and schools have all been plumbed in anticipation of recycled water use. The system serving these current 300 or so connections (about 1,800 acre-ft/year demand) is currently pressurized with potable water. Without the City's recycled water, this becomes a stranded investment, placing an unnecessary burden on potable water supplies.

The two golf courses are currently using their own wells to provide water. They are overlies under the Beaumont Basin Adjudication. Providing recycled water to an overlie, requires the overlie to transfer the equivalent amount of groundwater to the recycled water provider's groundwater storage account which can then be pumped for potable use. These offsets were included in BCVWD's UWMP and water supply assessments for existing and planned development.

Providing recycled water to the golf courses will not reduce BCVWD's potable water demand. It will not reduce BCVWD's need for Northern California imported water. For "maximum benefit" the City should be directed provide recycled water through BCVWD's existing system where there would be an immediate reduction in per capita water consumption and an equivalent reduction on the demand for Northern California Water.

3. **This discharge permit will require the installation of desalting processes to accommodate at least a portion of the flow.** (If planned groundwater recharge occurs as discussed previously, desalting and advanced oxidation processes for the full discharge flow will be required.) The City envisions a start of the art, "zero liquid discharge," system which will one of the first of its kind anywhere. Our concern here is two-fold: a) the schedule is much too aggressive for such a complex project and b) in light of the City's current financial situation, it is doubtful the City will be able to fund/finance the facilities needed for compliance.
4. **The City's past record of performance in meeting regional board deadlines is a concern.** The City was issued discharge order R8-2009-0002 in 2009 which allowed discharge to DP-007 and DP-008 providing the discharge met "full" Title 22. This was done to attempt to

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comply with "maximum benefit." Six years has passed and the effluent is still not complying with full Title 22. The City was notified of this fact in a meeting as early as 2007 or so by the Department of Public Health; the Department provided a list of items that needed to be addressed. Little has been done to our knowledge. We have concern, based on their past track record, that the City will not meet the requirements and schedule in the draft permit resulting in a water quality impact.

BCVWD wants to work cooperatively with the City and others to meet the water supply needs of the area which includes a diversified portfolio of recycled water, imported water, and storm water capture.

We appreciate the opportunity to provide comments to this draft permit. If you have any questions or need supporting information or data, please do not hesitate to contact Dan Jagers, Director of Engineering, or me at (951)-845-9581.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Fraser", with a long horizontal line extending to the right.

Eric Fraser
General Manager