



September 13, 2012



Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

Re: Proposed General Waste Discharge Requirements for ASR Projects

Dear Ms. Townsend:

ACWA appreciates the opportunity to comment on the proposed General Waste Discharge Requirements (Proposed Order) for Aquifer Storage and Recovery (ASR) Projects that Inject Drinking Water into Groundwater.

ACWA represents nearly 440 public water agencies in California that collectively supply 90% of the water delivered in California for domestic, agricultural and industrial uses. ACWA and its member agencies' highest priority is to protect public health while ensuring a reliable water supply for consumers throughout the state.

ACWA recognizes groundwater's critical role in California's water supply and the need for additional storage to meet current and future water demands in the state. In 2011, ACWA published *Sustainability from the Ground Up: A Framework for Groundwater Management in California*, which provides an overview of current groundwater conditions, challenges to sustainable groundwater management, case studies in effective local management, and offers 22 recommendations for consideration and action.

In the Framework, ACWA emphasizes the importance of increasing surface and groundwater storage opportunities and the need for additional conjunctive use projects that will result in more sustainable groundwater resources. ASR is a flexible, effective option for such groundwater recharge activities and should be supported when part of an approved groundwater management plan. We have several member agencies that are working diligently to enhance the flexibility of their water supplies through ASR projects and we are pleased that the State Board has made significant progress to help our agencies succeed in their efforts. We would especially like to acknowledge Central Valley Regional Water Quality Control Board Executive Officer Pamela Creedon and Assistant Executive Officer Rick Moss for their diligence and collaboration throughout this process.

ACWA would like to offer two comments for consideration by the State Water Board:

(1) We have commented to the Central Valley Water Board that we believe the use of treated drinking water in ASR projects should not be regulated as a waste. Although we understand the current limitations, ACWA encourages State Water Board staff to actively engage in any effort that would more accurately characterize the water quality when using treated drinking water to implement ASR projects.

(2) We would also like to see further clarification in the Proposed Order explicitly recognizing existing ASR projects that will allow them to continue effectively operating with the appropriate monitoring and reporting measures.

Further, ACWA encourages the State Water Board staff to carefully consider the comments of our member agencies that are pursuing ASR (whether existing or planned) as they have on-the-ground experience in the challenges faced when implementing projects and can provide a valuable perspective. We understand that you have received comments from several of our agencies including Cucamonga Valley Water District, Calleguas Municipal Water District, Los Angeles Department of Water and Power and Sacramento Suburban Water District/City of Roseville. In particular, SSWD and the City of Roseville have been working closely with us during the development of this proposed order and we support their contributions.

Thank you again for moving forward on the development of this Proposed Order and recognizing the importance of aquifer storage and recovery to the sustainable management of the state's surface and groundwater resources.

If you have questions, please feel free to contact me at 916-441-4545 or [danielleb@acwa.com](mailto:danielleb@acwa.com).

Sincerely,



Danielle Blacet  
Senior Regulatory Advocate

Cc: Thomas Howard, Executive Director, State Water Resources Control Board  
Pamela Creedon, Executive Officer, Central Valley Regional Water Quality Control Board  
Rick Moss, Assistant Executive Officer, Central Valley Regional Water Quality Control Board  
Gordon Innes, Sr. Water Resource Control Engineer, State Water Resources Control Board