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Tuesday, May 27, 2014

Jeanine Townsend
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Re: Draft General Waste Discharge Requirements for Recycled Water Use

Heal the Ocean (HTO), a Santa Barbara based citizens' action group focused on stopping sources of ocean pollution, appreciates this opportunity to offer comments on the State Water Resources Control Board's (SWRCB) draft General Waste Discharge Requirements ("draft Requirements") for Recycled Water Use. One of HTO's primary focus in recent years has been urging the expanded use of recycled water as a readily available alternative to ocean discharge of wastewater. Our ongoing "Waste(d)water" campaign has focused on identifying funding for the development of recycled water projects, and through our seat on the Santa Barbara County Integrated Water Management (IRWM) Steering Committee, we are working collaboratively with wastewater managers and water districts to get WWTPs on State-funded project lists, as well as reducing institutional barriers that prevent implementation of recycled water projects and educating the public on the merits of using treated wastewater to offset potable water use.¹

HTO strongly supports the State's continuing efforts to encourage recycled water use – from its recent action to lower interest rates on Clean Water State Revolving Fund loans for recycled water projects to the current effort to streamline the permitting process for recycled water projects used for landscaping.

However, with regard to the draft Requirements, HTO is strongly opposed to the implementation of the proposed "Potentially Present Priority Pollutants List (P4 List)" because important specifics are omitted.

For instance: how much baseline monitoring would the SWRCB require for *new* recycled water projects to determine pollutants not present and what kind of guidance would the SWRCB give to Regional Water Boards on approval of individual P4 Lists? We agree that it is an unnecessary waste of resources to monitor for pollutants that are consistently not present, but we are against the creation of the P4 List, and feel that agencies should

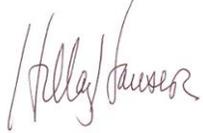
¹ See our Waste(d)water Infographic for an example of our public outreach efforts (<http://goo.gl/fi9Pjw>).

continue to monitor for the 126 "priority pollutants" until the SWRCB can offer greater specificity on the elements of a P4 monitoring program.

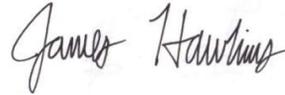
Heal the Ocean supports the SWRCB efforts as it moves forward with programs to meet the State's 2020 and 2030 production goals for recycled water, but only while ensuring public support and confidence in recycled water use across California.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in cursive script, appearing to read "Hillary Hauser".

Hillary Hauser, Executive Director

A handwritten signature in cursive script, appearing to read "James Hawkins".

James Hawkins, Policy Analyst