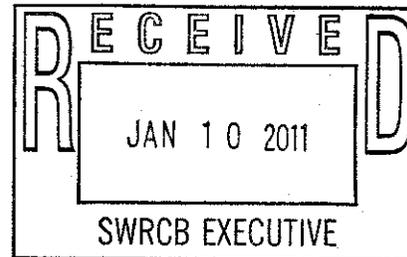




January 10, 2011

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



Subject: ***Comment Letter on Draft CEC Monitoring for Recycled Water***

Dear Members of the State Water Resources Control Board:

Thank you for the opportunity to comment on the State Board's Staff Report on Constituents of Emerging Concern (CEC) Monitoring for Recycled Water. This letter represents comments from Alameda County Water District (ACWD) and the Zone 7 Water Agency (Zone 7). Both ACWD and Zone 7 are groundwater management agencies, actively managing major local groundwater basins, importing State Project water, artificially recharging it to maintain basin levels and managing to ensure groundwater quality protections. ACWD provides potable water to over 333,000 people in the cities of Fremont, Union City, and Newark. Groundwater pumped from the Niles Cone Groundwater Basin comprises approximately 35% to 40% of the supply to ACWD's distribution system.

Similarly, Zone 7 provides potable water to retailers serving nearly 216,000 people in Pleasanton, Livermore, Dublin and parts of San Ramon. Groundwater from the Livermore-Amador Valley Groundwater Basin comprises approximately 20% to 40% of the total regional supply under average hydrologic conditions and up to 60% during "critically dry" years when State Water Project water is in short supply. Furthermore, Zone 7 had one of the state's first Salt Management Plans, approved by the San Francisco Bay Regional Board as part of the local Recycled Water Master Permit to ensure that its groundwater supplies are adequately protected against the potential salinity increases which would otherwise occur as a result of recycled water use over this permeable basin. The SMP has since been incorporated into Zone 7's Groundwater Management Plan.

Our comments are provided to supplement those in a letter that from the California Urban Water Association (CUWA), of which ACWD and Zone 7 are members. ACWD and Zone 7 support the points made in CUWA's letter on the State Board's Staff Report; however, the purpose of this letter is to provide additional comments to emphasize the need to retain local groundwater management

in order to ensure that groundwater quality is not degraded and that protection of existing and future potable groundwater supplies can be determined from individual attributes of groundwater basins.

In the Staff Report, paragraph 1 on page 4 contains the following:

"Monitoring for health-based CECs and performance-based indicator CECs is not recommended for landscape irrigation projects, because of the low water ingestion rate with landscape irrigation use. The ingestion rate with groundwater recharge/reuse is much higher, since the intent of the use is to provide drinking water supplies."

We are concerned this particularly strong statement could lead to new State Board regulations that could hinder California Department of Public Health (CDPH), Regional Board or local groundwater management agencies from imposing monitoring requirements, especially groundwater monitoring, on any landscape project, regardless of the particular circumstances of the project. This could be detrimental to the interests of groundwater management agencies with responsibility for maintaining quality of groundwater supplies for potable consumption by the public. We understand that the Expert Panel did not indicate a general threat to groundwater from emerging contaminants applied through irrigation of recycled water on landscapes. We concur that there may be no need at this time for the State Board to impose a blanket, statewide requirement for groundwater monitoring at landscape irrigation projects.

However, new State Water Board regulations should not take the extra step of restricting others such as CDPH, local Regional Boards or local groundwater management agencies from requesting such monitoring for specific cases when there is a compelling basis to do so. Groundwater or soil-water monitoring could be warranted, for example, at a recycled water irrigation project located in a recharge area where the first-encountered drinking water aquifer is shallow or where highly permeable materials exist, and in which critical, high capacity municipal water production wells are located. In addition, while the intent of a landscape irrigation project is not to provide drinking water supplies, large-scaled landscape irrigation projects or a combination of smaller landscape irrigation projects that do not have volumetric loading restrictions by region, could essentially have the same effect on groundwater quality as surface application recharge projects in certain hydrogeologic conditions.

Thank you for your consideration of these comments. If you have any questions or wish to discuss the contents of this letter, please contact Robert Shaver or Steven Inn at the Alameda County Water District at (510) 668-4499 or Cheryl Dizon or Matt Katen at Zone 7 Water Agency at (925) 454-5000.

Sincerely,

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cc:

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