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July 2, 2012

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

Via Email: commentletters@waterboards.ca.gov



**SUBJECT: COMMENT LETTER – AMENDMENT TO THE RECYCLED
WATER POLICY**

Dear Ms. Townsend:

The purpose of this letter is to provide comments from the Groundwater Resources Association of California (GRA) on the proposed Amendment to the State Water Resources Control Board's Recycled Water Policy regarding monitoring of constituents of emerging concern (CEC) in recycled water used for groundwater recharge and landscape irrigation.

We understand that the State Water Board convened a Science Advisory Panel (Panel) that provided recommendations for CEC monitoring in a report dated June 25, 2010, and that the Panel's recommendations were based on current science. As such, GRA's recommendation is that the proposed Amendment closely follow the Panel's recommendations, including Amendment provisions that:

- Limit CEC monitoring for groundwater recharge projects to the constituents recommended by the expert panel;
- Provide an approach whereby CEC monitoring requirements may be periodically reviewed and adjusted based on previous data; and
- Allow for inclusion and consideration of CEC data collected during previous phases of activity, e.g., demonstration or pilot testing, in establishing initial and baseline conditions.

In addition, GRA recommends that the proposed Amendment be revised such that the CEC provisions of the Recycled Water Policy and the California Department

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of Public Health's (CDPH) draft recycled water recharge regulations be closely aligned, with respect to surface and subsurface monitoring locations. Maintaining consistency between these two state regulatory documents pertaining to recycled water recharge will reduce confusion and inefficiency.

GRA fully supports the State Water Board's Policy goal of increasing the use of recycled water as an important way that the State can work toward water sustainability. By relying on the recommendations of the Panel, the State Water Board can ensure that CEC identification and monitoring are scientifically based and appropriate to protect public health, while providing clear and consistent guidance to recycled water project proponents.

Sincerely,

A handwritten signature in blue ink that reads "Roy L. Herndon".

Roy L. Herndon, PG, CHg
Director, GRA