



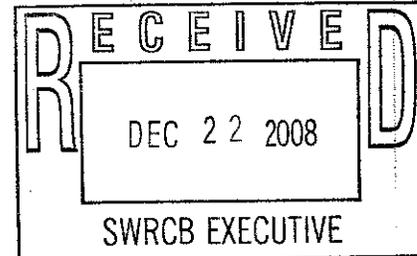
## Delta Diablo Sanitation District

OFFICE AND TREATMENT PLANT: 2500 PITTSBURG-ANTIOCH HIGHWAY, ANTIOCH, CA 94509-1373  
TEL.: (925) 756-1900 ADMIN. FAX: (925) 756-1961 MAINT. FAX: (925) 756-1963 OPER. FAX: (925) 756-1962 TECH. SVCS. FAX: (925) 756-1960  
www.ddsd.org

December 22, 2008

VIA ELECTRONIC MAIL ([commentletters@waterboards.ca.us](mailto:commentletters@waterboards.ca.us)) & U.S. MAIL

Executive Office  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100



ATTENTION: Jeanine Townsend, Clerk to the Board

SUBJECT: COMMENT LETTER – PROPOSED RECYCLED WATER POLICY

Dear Chair Doduc & Members of the Board:

Thank you for the opportunity to comment on the State Water Resource Control Board's (Water Board) Proposed Recycled Water Policy (Policy). The District appreciates the Board's leadership in developing a policy that promotes the use of recycled water and recognizes the importance of recycled water to California's future sustainable water supply. We are aware that the Association of California Water Agencies, the California Association of Sanitation Agencies and the WaterReuse Association (the Associations) have submitted comments on the proposed Policy, and we endorse the language changes the Associations have recommended, with the exceptions noted below.

We support the overall structure and approach of the proposed Policy and believe it is a significant improvement over the previous drafts. However, we urge the State Water Board to consider additional revisions to the proposed Policy to provide greater clarity, increase the practicality of implementation, and conserve the limited resources of water recyclers, their customers, and the Water Boards.

### **Salt and Nutrient Management Plans**

The District is pleased that the proposed Policy recognizes that salt and nutrient issues within groundwater basins cannot be resolved by focusing on recycled water use alone, and that the proper approach to addressing these issues is through locally controlled and driven plans, developed by broad groups of stakeholders, including water, wastewater, and stormwater agencies, the Regional Water Boards, and other salt/nutrient contributing stakeholders.

We are concerned, however, that the Policy does not limit the salt and nutrient planning requirement to those basins where beneficial uses are impaired or threatened, or where high quality waters are in need of protection. While the Policy recognizes that the plans may vary in complexity, the plans are still required for all basins. Since the development and implementation of the plans is critical in some areas, but not everywhere, it is important for the Policy to clearly prioritize where plans should be developed, so that limited public resources can be devoted to areas of real concern.

Chair Doduc & Members of the Board  
December 22, 2008  
COMMENT LETTER – PROPOSED RECYCLED WATER POLICY  
Page 2

We also do not believe that groundwater monitoring for salts and nutrients is necessary, or even feasible, in every basin and sub-basin in this large and diverse state. Finally, the organization and structure of this section should be improved to provide a more useful outline of how to proceed with these plans. We have attached recommended language changes to address these concerns, all of which are consistent with the goals and intent of accomplishing salt and nutrient management planning in important groundwater basins (see Attachment 1).

### **Incidental Runoff**

Incidental runoff, by definition, consists of small amounts of unintentional runoff from irrigation projects. This is no different from the runoff that occurs in any irrigation project, regardless of the source of water used. We agree with the Associations that the Policy should state that incidental runoff does not pose a threat to water quality. In addition, we share the concern that the new language regarding incidental runoff is overly detailed and prescriptive for a Policy, and that conditions regarding practices that are appropriate for a particular site should be left to the permitting process.

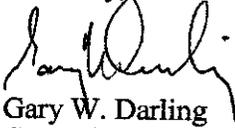
To address this concern, we propose that the language be revised to delete the specific requirements set forth in Section 7(a)(1) through (4) and replaced with a simple statement that water recyclers shall develop and implement an operations and management plan that provides for compliance with the site control requirements of Title 22.

### **Charge of Blue Ribbon Advisory Panel**

While we support additional research on CECs, as stated above we believe that imposing monitoring requirements would be premature. Therefore, we request a change in Section 10.b.(4). In addition to charging the panel with determining if the list of CECs to be monitored would change with the level of treatment and use, we believe the panel should be charged with identifying treatment technologies that will cost-effectively remove CECs.

Thank you for the opportunity to provide our comments on the proposed Policy.

Sincerely,

  
Gary W. Darling  
General Manager

AWR:awr

Attachment

cc: CORP.15.03-CORRES-39  
Chron File

Attachment 1

Proposed Alternative Language Regarding  
Salt/Nutrient Management Plans

Replace the Existing Policy Language,  
beginning at page 5, line 157 through Page 8, line 279, with the following :

1. *Salt/Nutrient Management Plans*

a. *Introduction*

- (1) Some groundwater basins in the State contain salts and nutrients that exceed or threaten to exceed water quality objectives established in the applicable Water Quality Control Plans (Basin Plans), and not all Basin Plans include adequate implementation procedures for achieving or ensuring compliance with the water quality objectives for salt or nutrients. These conditions can be caused by natural soils/conditions, discharges of waste, irrigation using surface water, groundwater or recycled water and water supply augmentation using surface or recycled water. Regulation of recycled water alone will not address these conditions.
- (2) It is the intent of this Policy that salts and nutrients from all sources be managed on a basin-wide or watershed-wide basis in a manner that ensures attainment of water quality objectives and protection of beneficial uses. The State Water Board finds that the appropriate way to address salt and nutrient issues is through the development of regional or subregional salt and nutrient management plans rather than through imposing requirements solely on individual recycled water projects.

b. *Adoption of Salt/ Nutrient Management Plans.*

- (1) The State Water Board recognizes that, pursuant to the letter dated \_\_\_\_\_ attached to this Policy, water and wastewater entities, together with salt/nutrient contributing stakeholders, will fund locally driven and controlled, collaborative processes open to all stakeholders that will prepare salt and nutrient management plans for each basin/sub-basin in California, including compliance with CEQA and participation by the Regional Water Board staff.
  - (a) It is the intent of this Policy that every groundwater basin/sub-basin, as defined by CDWR in Bulletin 118, will be assessed using a common methodology so that consistent salt/nutrient management plans can be developed throughout the State.

towards completion of a plan. In no case shall the period for the preparation of a plan exceed seven years.

- (g) The requirements of this paragraph shall not apply to areas that have already completed a Regional Water Board approved salt and nutrient plan.
- (2) Within one year of the completion of the initial assessment indicating that a salt and nutrient management plan is not required or the completion of a salt and nutrient management plan, the Regional Water Boards shall adopt revised implementation plans, consistent with Water Code section 13242, reflecting the results of these analyses. For those groundwater basins within regions where water quality objectives for salts or nutrients are being, or are threatening to be, exceeded, the Regional Board's implementation plans shall be based on the salt and nutrient plans required by this Policy.
  - (3) Each salt and nutrient management plan shall include the following components:
    - (a) A description of the basin/sub-basin, land uses in the basin/sub-basin, in-situ water quality in the basin/sub-basin and the basin recharge area including any watershed lands outside the mapped limits of the basin/sub-basin, which recharge the basin/sub-basin.
    - (b) Identification of salt and nutrient sources in the basin/sub-basin and estimates of salt and nutrient loading in the basin/sub-basin, including estimates of changes to loading that may occur because of planned changes to:
      - (i) land use, including low impact development proposals in the watershed;
      - (ii) irrigation water quality and irrigation patterns, and;
      - (iii) intentional recharge including rainwater/stormwater recharge.
    - (c) Water recycling and stormwater recharge/reuse goals and objectives.
    - (d) A fate and transport analysis of salts and nutrients under the existing and planned patterns of land and water use.
    - (e) An analysis of implementation actions for managing salt and nutrient loading in the basin/sub-basin on a sustainable

- (iii) The preferred approach for developing monitoring protocols is to use existing wells for data collection, when the existing wells provide the spatial coverage necessary to determine water quality throughout the most critical areas of the basin/sub-basin.
  - (iv) The monitoring protocols shall include a requirement that data will be compiled and reported to the Regional Water Board every three years.
- (5) Nothing in this Policy shall prevent stakeholders from developing a plan that addresses additional constituents and/or is more protective of water quality than applicable standards in the Basin Plan. No Regional Water Board, however, shall seek to modify Basin Plan objectives without full compliance with the process for such modification as established by existing law.