

Department of Water  
Resources  
Keith DeVore, Director

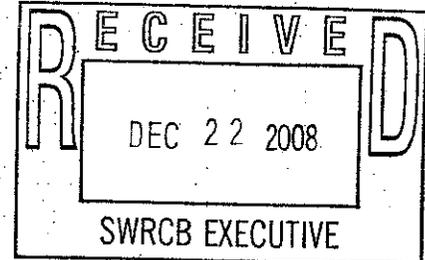


Public Comment  
Recycled Water Policy  
Deadline: 12/22/08 by 12 noon

Including service to the cities of  
Elk Grove and Rancho Cordova

SACRAMENTO COUNTY  
**WATER AGENCY**

December 22, 2008



Ms. Jeanine Townsend  
Clerk to the Board, Executive Office  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, Ca 95812-0100

Subject: Comment Letter – Proposed Recycled Water Policy

Dear Ms. Townsend:

Thank you the opportunity to review the draft Recycled Water Policy (Policy) dated November 4, 2008. The Sacramento County Water Agency (SCWA) has reviewed the proposed Policy and would like to comment on the following section:

1. Section 4(a)(2) of the Policy proposes that recycled water producers shall make recycled water available to water purveyors on reasonable terms and conditions. This section further states that such terms and conditions may include payment of a fair and reasonable share of the cost of the recycled water supply and facilities.

**Comments:** The Policy needs to clarify the term "reasonable terms and conditions" so that costs developed in conformance with this section will not conflict with the term "reasonable cost" as defined in Water Code section 13550(a)(2). Section 13550 (a)(2) requires water purveyors to furnish recycled water at a reasonable cost to the user. The term "reasonable cost" is further defined as "comparable to, or less than, the cost of supplying potable domestic water."

It should be noted that in Central and Northern California, where groundwater is of adequate supply, the cost to purchase recycled water is substantially higher than the cost to pump and treat groundwater for potable uses. Since water purveyors are required by the Water Code to furnish recycled water at a "reasonable cost," they may not be able to recover their actual costs if the price of recycled water is substantially higher than potable water. If this is the case, this Policy will render it economical infeasible for water purveyors to furnish recycled water to users in areas where cost to purchase recycled water is substantially higher than its potable water supply.

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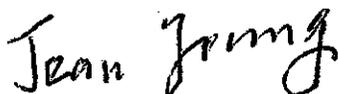
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2. The Policy does not provide adequate monitoring requirement to protect public drinking water supply wells from contamination by Constituents of Emerging Concern (CEC) and other potential contaminants. The term CEC includes chemicals from personal care products and prescription and non-prescription drugs. The Policy indicates that recycled water has been regulated to a quality standard that exceeds the regulatory standard applied to potable water and is a disincentive for recycled water use.

The SWRCB should be aware that the source of recycled water supply is mainly from the wastewater discharged to sewer lines. This type of waste stream contains higher levels of contaminants and CEC which can't or may not have been adequately removed by the treatment methods used by recycled water producers. Contrary to recycled water, surface water streams combine flows from a variety of sources including melting snow, rainwater and other tributary influents. Such a wide range of sources provide a surface water body the ability to dilute any contaminant and CEC which may have been discharged into the river.

SCWA could support the Policy if the SWRCB (1) clarifies the term "reasonable cost" to ensure that the cost of purchasing recycled water will be economically feasible to water purveyors; and (2) provide sentry wells for drinking water wells that are located at downgradient of any recycled water facilities.

Sincerely,



Jean Young, P.E.,  
Associate Civil Engineer  
Water Supply Planning  
Department of Water Resources  
County of Sacramento

cc: John Coppola, Darrell Eck, Dave Underwood