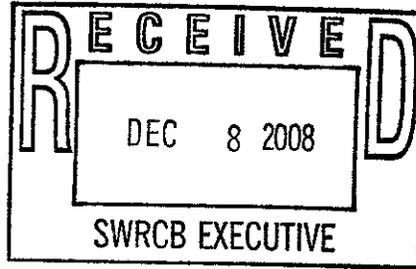


December 5, 2008

Tam Doduc, Chair
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814



RE: Proposed Recycled Water Policy

Dear Chair Doduc and Members of the Board:

San Diego Coastkeeper, a non-profit environmental organization with thirteen years of experience protecting the bays, beaches, watersheds and ocean areas of San Diego, would like to extend its support for and offer comments on the State Water Resources Control Board's proposed *Recycled Water Policy*. Coastkeeper would like to thank policy stakeholders for their amendments following our previous letter dated October 27, 2007, though it is concerning that indirect potable reuse still remains absent in the document.

California faces the crisis of rising water demand while supplies shrink amidst droughts and recent legal decisions. San Diego in particular relies nearly entirely on imported water to sustain its current way of life. Recycled water, highly treated wastewater with impurities and solids removed, presents the opportunity to increase water security in the state of California while reducing the effluent emitted into local water systems. Coastkeeper strongly supports efforts to increase the usage of recycled water, not only for non-potable purposes such as irrigation, but also in the form of indirect potable re-use projects.

Coastkeeper's work to protect the marine environment includes advocacy for water conservation as well as pilot projects on indirect potable use of recycled water in San Diego County. Following successful projects such as the Orange County Water District's Groundwater Replenishment System, our organization recognizes the potential of water recycling to augment drinking water supplies while remaining a cost-effective and safe option for both people and the environment.

The joint effort between environmental stakeholders and the water industry to promote the use of recycled water in this policy is commendable and we support its passage by the Board with a few amendments to make the policy more effective for all regions of California, especially San Diego. Our specific comments on the draft policy are below.

1. Support for Reservoir Augmentation Should Be Included Along with Groundwater Recharge

California's diverse landscape and natural resources vary significantly by region and certain projects, such as groundwater recharge, may not be accessible in all areas. According to the 2006 Water Reuse Study by the City of San Diego, San Diego County only has one groundwater basin suitable for recharge and this basin is not currently considered viable when all factors are considered. However, the region contains several reservoirs which would benefit from recycled water augmentation. Coastkeeper favors the addition of a section on reservoir augmentation in the *Recycled Water Policy* in order to fully utilize the resources of all areas in promoting recycled water use. Either as an addition to the section titled "Groundwater Recharge Projects" (line 318) or added as its own following section, a clear and concise statement of support for reservoir augmentation would fit seamlessly into the proposed policy. As an addition, it should also be listed in salt/nutrient plan section (lines 205, 245-246) and the antidegradation section (line 356) for completeness.

2. Policy Should Directly Mention and Endorse Indirect Potable Reuse

While potable use of recycled water would indirectly result from items in the policy such as groundwater recharge, directly stating support for indirect potable reuse would result in an increase in these projects statewide. By purifying water through microfiltration, reverse osmosis, and UV lights with hydrogen peroxide, recycled water becomes clean enough to add directly into water systems and saves the cost of constructing separate pipelines. An endorsement within the policy would aid in encouraging regions to begin new projects and combat any negative labeling reuse has received. The current language actually confuses and disincentives indirect potable reuse by stating in lines 359-360 that "projects using recycled water have the potential to lower water quality," while neglecting to mention that these projects also have the potential to improve the quality of current water supplies after being fully treated. For example, the Orange County Water District's Groundwater Replenishment Program reports adding purified recycled water actually lowered the mineral levels in local groundwater. We recommend that this language be replaced with language that asserts the positive contribution that indirect potable reuse can have to water sources by augmenting over-pumped basins and reservoirs and decreasing mineral content of sources through mixing with recycled water.

Thank you for allowing the public to comment on this critical subject. We appreciate the opportunity to contribute on such issues in future policy. Please feel free to contact me with any questions.

Sincerely,



Jessica Wall, Policy Intern
San Diego Coastkeeper

Gabriel Solmer, Legal Director
San Diego Coastkeeper