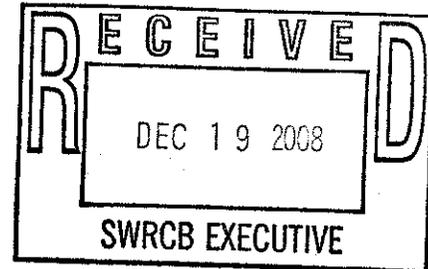




THE CITY OF SAN DIEGO

December 19, 2008

Ms. Tam Doduc, Chair  
And Members of the  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812



Attn: Ms. Jeanine Townsend, Clerk to the Board

Dear Chair Doduc and Members of the Board:

**Subject: Comment Letter – PROPOSED RECYCLED WATER POLICY**

Thank you for this opportunity to submit public comments related to the State Water Resources Control Board's (SWRCB) proposed Recycled Water Policy.

The City of San Diego's Water Department (City) commends the SWRCB for recognizing the important role recycled water plays in meeting the State's present and future water demands. Also, the City commends the SWRCB for developing this proposed Recycled Water Policy with good stakeholder involvement. We are aware that the Association of California Water Agencies, the California Association of Sanitation Agencies, the California Urban Water Agencies and the WaterReuse Association (the Associations) have submitted comments on the proposed Policy. We endorse the language changes the Associations have recommended with our additional comments noted below.

As background, the City owns and operates two reclamation facilities with a treatment capacity of 45 million gallons per day (mgd). The expansion of the City's production of recycled water is a core component of our water supply diversification strategy and is incorporated into the City's Urban Water Management Plan (UWMP) and also in the UWMPs of both the San Diego County Water Authority (SDCWA) and the Metropolitan Water District of Southern California (MWD).

It might interest the SWRCB to note that within the City of San Diego's service territory, approximately 90% of the recycled water put to beneficial use is for irrigation and the remaining 10% is used in cooling towers. In addition, a pilot indirect potable reuse project was authorized in 2008 by San Diego's City Council and is currently underway.



**Water Department**

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As you may know, the San Diego region has limited groundwater supplies and basins, relying predominantly on imported water supplies to provide approximately 85% to 90% of the region's water demands. Recycled water represents approximately 3% of the City's total demands (after conservation).

Given the critical role that recycled water plays in our region, we are keenly interested in eliminating unnecessary regulatory barriers that inhibit the use of recycled water.

**General Comments:**

- Baselines of groundwater quality in *each* basin/sub-basin should be established to develop basin-specific standards.
- Coastal basins and aquifers should be considered for their unique attributes and have specific policies for inland basins versus coastal basins.
- Confined and unconfined aquifers within basins should be addressed separately because water for municipal purposes produced from unconfined aquifers is generally considered groundwater under the influence of surface waters. This difference between confined and unconfined must be treated as such.
- When recycled water is treated with reverse osmosis and other advanced technologies, the quality of that water is of sufficient quality that it may serve as excellent groundwater storage reservoirs for tertiary treated groundwater. It is not necessary to treat the water to advanced levels to maintain the integrity of the groundwater basin. Advanced treatment of recycled water is energy intensive and expensive to maintain. Requiring advanced treatment of recycled water for groundwater recharge will effectively eliminate numerous opportunities to utilize recycled water to help local communities meet water demands.
- Recycled water policies should incorporate thinking "outside the box" to begin promoting alternative options such the use of grey water for onsite irrigation purposes.
- Recycled water policies should consider the use of untreated, non-potable groundwater to augment water supply to offset high seasonal demands.

**Recycled Water Policy**

- Lines 33-34: "*increase the use of stormwater by at least 500,000 acre feet over use in 2007*" needs to be clarified (determine how to reach this goal) and more readily quantified for understanding in order to meet this goal.

- Lines 35-36: "*increase the amount of water conserved in urban and industrial uses by comparison to 2007 by at least 20% by 2020*" is not fair or achievable for the City of San Diego unless we receive credit for past water conservation saving practices. We anticipate State legislation to be introduced in 2009 that addresses agencies such as ours that implemented water saving BMP's years ago to be able to receive retroactive credit.
- Lines 159-167: should consider changing objectives to meet natural conditions, not necessarily establish regional or basin wide standards, but rather be aquifer specific.
- Lines 183-194: What does "*consistent salt nutrient management plan mean*"? Does it mean the same treatment technologies and water quality constituent concentration standards, or that each plan should have the same components?
- Lines 183-194: Why not change the requirements of a groundwater management plan to include salt nutrient management components? Why do we need a separate plan?
- Lines 201-207: Need a more detailed definition for Basin and Sub-basin.
- Lines 377-381: Geochemistry is important and needs to be considered on an aquifer by aquifer basis. Therefore, policies need to be flexible.
- Lines 514-516: "*strongly encourage all water purveyors to provide financial incentives for water recycling and stormwater recharge and reuse projects*" is problematic for municipal water agencies such as ours due to budgetary constraints. However, the City is offering financial rate incentives for the use of recycled water and is currently pursuing an indirect potable reuse project. Any additional projects would need to be considered with the City's financial outlook associated with limited financial resources to provide for financial incentives.

#### **Draft Staff Report**

- Page 7: Need to more clearly define "*High Quality Waters*".
- Page 7: 3<sup>rd</sup> paragraph, under Anti-degradation - states that if a basin has waters of high quality and the quality in established policies is lowered, the high quality water shall not be degraded. The opposite needs to be considered, too. If there is a basin of low quality and the water quality policies are higher than that of the basin, the policy should be flexible enough to allow recharging the basin with water that is better than the existing quality, but not necessarily meets the recommended standard of the policy.

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- Page 10: *"The intent of the proposed policy is that the degradation of groundwater quality be evaluated regionally"*. California needs to consider what Arizona is doing with their Active Management Areas. Instead of establishing regional requirements, perhaps Active Management Areas, similar to Arizona's, can be established within each basin to address those basins that are most subjected to impact or have most potential for beneficial use. This will help prioritize and focus resources on those basins that need it most. Why is it necessary to submit a salt nutrient plan for basins that have little or no value?
- Page 11: 1<sup>st</sup> paragraph, *"...secondary maximum contaminant limitations"*, change limitations to levels.
- Page 11: 1<sup>st</sup> paragraph, *"The purpose of a groundwater recharge reuse project is to recharge for later extraction and use as municipal supply"*. Also include the following purposes:
  - Recharge groundwater to create sea water intrusion barriers in coastal aquifers
  - Increase non-potable irrigation supply
  - Create riparian habitat corridors
  - Increase groundwater discharge in streams

Again, the City appreciates the opportunity to provide our comments and looks forward to working with the SWRCB and its staff in adopting the final Recycled Water Policy. If you have any questions regarding our comments, please call me at (619) 533-4112.

Sincerely,



Marsi A. Steirer  
Deputy Director, Water Resources & Planning Division

MS/vjl