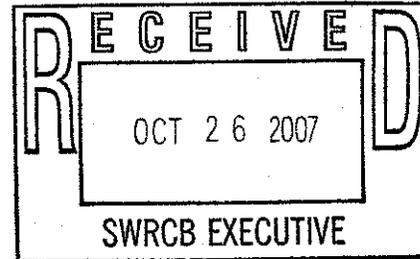


October 26, 2007

12/4/07 Bd. Mtg.
Water Recycling Policy
Deadline: 10/26/07 Noon

Via E-mail & U.S. Mail

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



commentletters@waterboards.ca.gov

RE: Comment Letter – Proposed Water Recycling Policy

Dear Members of the State Water Board:

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to provide comments on the draft Water Recycling Policy (Policy). EBMUD has an extensive existing recycled water program and also has a number of new recycled water projects planned. To date, we have invested over \$100M in our recycled water program. Recycled water is a critical component of our overall water supply future and also a vital resource for our regional economy.

We thank the State Water Board for its leadership in undertaking the Policy to promote the use of recycled water. The State Water Board is making commendable efforts to achieve consistency in water recycling permitting and regulation. We support the development of a Policy that recognizes and treats recycled water as a resource rather than a waste.

However, EBMUD has serious concerns regarding the proposed total dissolved solids (TDS) provisions of the draft Policy. The requirement that TDS in the recycled water not exceed the source water TDS plus 300 mg/L is unachievable in our system. EBMUD's high quality source water contains less than 100 mg/L of TDS. It is unrealistic and unnecessary to restrict our recycled water to less than 400 mg/L of TDS. Such a limitation would significantly reduce EBMUD's ability to provide recycled water in our service area. In fact, two of EBMUD's currently operating recycled water facilities which are partially funded by SWRCB grants and low-interest loans would be immediately noncompliant with this requirement. We request the alternative that this provision be eliminated and be replaced with a requirement that if the underlying groundwater basin has a numeric standard established for TDS, then a recycled water TDS shall be established based on an appropriate maximum TDS level for that recycled water project, given the specific circumstances including the recycled water application, groundwater uses and soil characteristics.

Jeanine Townsend
October 26, 2007
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EBMUD is a member of the WaterReuse Association, the California Association of Sanitation Agencies, the California Urban Water Agencies, the Bay Area Clean Water Agencies, and the Association of California Water Agencies who will also be submitting comments regarding the Policy.

Thank you for considering our comments. If you have any questions, please contact me at (510) 287-1496.

Sincerely,



DAVID R. WILLIAMS
Director of Wastewater

DRW:LHH:sma

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