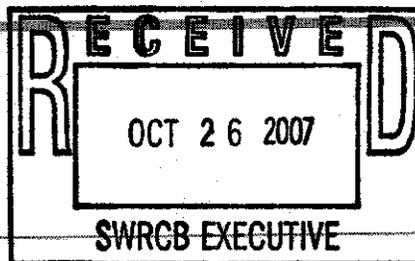


Ryan Maughan - Draft Water Recycling Policy



From: <Jherriaw@aol.com>
To: <rmaughan@waterboards.ca.gov>
Date: 10/26/2007 11:57:55 AM
Subject: Draft Water Recycling Policy

Dear Mr. Maughan:

On behalf of the South Delta Water Agency I would like to make two comments to the Draft Recycling Policy. The first is that the Board should make clear that recycling may be a method of supplementing supplies and of achieving other goals in general, but not in all cases. For example, when a user on the San Joaquin system recovers its waste water or return flow for reuse, that may decrease the amount of water entering into the river system and adversely affect other users. At the very least, the cumulative effect of such reuse is that some other party is then obligated to increase reservoir releases in order to meet such standards as the Delta Outflow. Hence the reuse of water shifts a shortage onto other parties.

Second, the policy may be confusing with regard to discharges/uses of the recycled water. It requires that the water not be above a certain TDS/EC as compared to the original supply, and also requires that it not cause or contribute to an exceedance of any water quality standard. Again, on the San Joaquin system this means that most discharges of recycled water will make it more difficult in meeting the salinity standards at Vernalis and downstream even though they will not (necessarily) cause an exceedance because New Melones or other Bureau or SWP assets adjust to meet the standard. Hence, the discharge may not contribute to a violation, but it nonetheless makes compliance more difficult and forces someone else to do more in order that the standard be met.

At this point a distinction should be made between the use of river or ground water which results in a concentration of the natural constituents in the water, and those who add salts to the water and eventually to the river. Consumptive use should not (generally) be limited by the quality of the return flow unless the user is also adding constituents of concern like salts.

Please feel free to contact me if you have any questions, JOHN

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