



Sent via ELECTRONIC MAIL to commentletters@waterboards.ca.gov

September 12, 2017

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95814



Re: Association of California Water Agencies' Comments Regarding the Proposed Surface Water Augmentation Regulations

Dear Ms. Townsend:

The Association of California Water Agencies (ACWA) appreciates the opportunity to comment on the State Water Resources Control Board's (State Water Board's) proposed "Surface Water Augmentation (SWA) Using Recycled Water" regulations. ACWA represents nearly 430 public water agencies that collectively supply approximately 90% of the water delivered in California for domestic, agricultural, and industrial uses. Many of ACWA's public agency members are entrusted with the responsibility of supplying the public with safe and reliable drinking water. Ensuring the safety of drinking water supplies by complying with all relevant state and federal standards is the highest priority of these agencies.

ACWA's members also pride themselves in their local efforts to diversify their sources of water supply and to improve regional self-reliance. As stated in its *Statewide Water Action Plan for California*, ACWA believes that the state should continue to support development of local and regional water resources that improve each region's water supply reliability and, where applicable, augment imported surface water supplies. Affirmed by Governor Brown's *California Water Action Plan*, increasing the use of recycled water is one way of achieving augmentation.

ACWA supports the proposed SWA regulations that would assist the State Water Board in establishing statewide uniform water recycling criteria for SWA while protecting public health at local and regional levels. To further strengthen the proposed regulations, ACWA emphasizes that coordination between the State Water Board and the Regional Water Quality Control Boards will be crucial to successful and effective implementation of the regulations. As such, ACWA recommends that Article 5.3 of Division 4 provide for a streamlining of regulatory decision-making processes, including application review and approval, monitoring, reporting, and consulting processes. Such streamlining would reduce administrative redundancies, minimize project delays, and eliminate the preparation of duplicative document submissions.

ACWA appreciates the thorough effort provided by the Division of Drinking Water and the Expert Panel in the development of these proposed regulations. ACWA believes that the SWA regulations will enable its members to further diversify their sources of water and improve their

water supply reliability. If you have any questions regarding this comment letter, please contact me at adamb@acwa.com or (916) 441-4545.

Sincerely,



Adam Borchard
Regulatory Advocate