



September 12, 2017

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Felicia Marcus, Chair  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814



Subject: Comment Letter – Proposed Surface Water Augmentation Regulations

Dear Chair Marcus and State Board members:

On behalf of the California Urban Water Agencies (CUWA), we thank you for the opportunity to comment on the proposed regulations for surface water augmentation (SWA regulations).

CUWA is committed to the development of reliable, high-quality water supplies that are fully protective of public health at all times. CUWA agencies appreciate DDW's efforts and the great deal of thought that went into developing the proposed SWA regulations. We acknowledge DDW for the willingness to incorporate input provided by the Expert Panel and the external scientific peer review.

As noted in CUWA's water reuse policy principles, potable reuse is an important component of current and future local water supply portfolios statewide. Most CUWA agencies are also members of WaterReuse California (WRCA) and have been kept informed of and engaged in the development of WRCA's comments and recommendations. CUWA has many areas of common interest with WRCA toward the goal of advancing potable reuse and are in alignment with and supportive of their position on the surface water augmentation regulations. CUWA has two additional comments to ensure clarity and flexibility for the successful implementation of surface water augmentation statewide.

### 1. Continue Collaboration on Advanced Water Treatment Operator Training and Certification

The proposed language related to the Surface Water Source Augmentation Project (SWSAP) Operations Plan (§64320.322 b) requires that personnel operating and overseeing the SWSAP operations have training in (a) proper operation of the treatment processes, (b) the California Safe Drinking Water Act and its regulations, and (c) the potential adverse health effects associated with the consumption of drinking water that does not meet drinking water standards.

CUWA supports the industry's preference to allow operators with either water or wastewater backgrounds to operate an advanced water treatment facility for potable reuse applications (highlighted in the CUWA white paper, "*Potable Reuse Operator Training and Certification Framework*", developed in collaboration with WRCA, California Water Environment Association (CWEA), and California Association of Sanitation Agencies (CASA)). As such, CUWA appreciates that DDW did not explicitly require one certification over another in the proposed regulations. To encourage safe and reliable operations of advanced water treatment for surface water augmentation, CUWA encourages DDW's ongoing collaboration with American Water Works Association, California-Nevada Section (AWWA CA-NV) and CWEA for the development of an

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advanced water treatment operator certification program (e.g. through AWWA CA-NV) to satisfy the stated operator training requirements.

**2. Clarify the requirements for additional treatment for a reservoir receiving 10% recycled water**

The current language in Section 64668.30 (c)(2)(A) indicates that additional treatment for a reservoir receiving 10%, by volume, of recycled water must be “independent of and not reliant on the other treatment processes”. CUWA requests that DDW refine the language to define the meaning behind this phrase and the intent of the requirement.

We thank you again for the opportunity to contribute to the successful implementation of surface water augmentation through potable reuse in California.

Sincerely,



Cindy Paulson, Ph.D.  
CUWA Executive Director



Wendy Broley, PE  
CUWA Staff Engineer