

September 12, 2017

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



SENT VIA EMAIL: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**Subject: Comment Letter – Proposed Surface Water Augmentation Regulations**

Dear Chair Marcus and Members of the Board:

The Santa Clara Valley Water District (District) thanks the State Water Resources Control Board (Water Board) for the opportunity to comment on the proposed regulations for Surface Water Augmentation (SWA).

As the primary water resources agency for Silicon Valley, in addition to supplying reliable water, the District works to protect the quality of groundwater and surface water in Santa Clara County. In cooperation with local partners, the District is also expanding the use of recycled water and has plans to develop potable reuse. These efforts include building the Silicon Valley Advanced Water Purification Center (SVAWPC), the largest purification facility in northern California, and successfully operating this facility for the past three years. The SVAWPC supplements the capacity of the South Bay Water Recycling system in San José and enhances the quality of non-potable recycled water delivered by this system. The District supports ongoing potable reuse research at SVAWPC, including a reverse osmosis concentrate management study in partnership with Bay Area Clean Water Agencies, San Francisco Estuary Institute, Stanford University, and University of California Berkeley. The District's future plans include the development of potable reuse in the county by expanding the capacity of the SVAWPC and by potentially constructing additional advanced water purification facilities in partnership with recycled water producers in the county, including San José / Santa Clara, City of Palo Alto, City of Mountain View, City of Sunnyvale, and South County Regional Wastewater Authority.

The District is committed to enhancing the reliability of water supplies, as well as developing supplies that are locally controlled and drought-resilient in Santa Clara County. To fulfill this commitment, the District is planning a variety of potable reuse projects, including SWA.

The District is pleased with the effort the Division of Drinking Water (DDW) and the Expert Panel put into preparing the proposed regulations. The District is actively participating in the development of potable reuse regulations in California through public comment, stakeholder meetings, and the sharing of data generated at the SVAWPC. The District is supportive of the proposed regulations and sees their potential for expanding the implementation of potable reuse in California. While the District is supportive, we have comments which we believe will enhance the clarity and flexibility of the proposed regulations.

1. Operator Training and Certification

The District agrees with the findings of the California Urban Water Agencies white paper "*Potable Reuse Operator Training and Certification Framework*" which recommends that potable reuse operators include water and/or wastewater operators. The District's Board of Directors has established a policy position where they support changing certification requirements for water treatment operators who work at recycled water facilities. The District is also actively involved in AWWA's development of an advanced water treatment certification program. The District appreciates that a particular operator's certification was not singled out in the proposed regulations. The District encourages the State Board to continue to collaborate with AWWA and others to develop an advanced water treatment operator certification program that satisfies proposed and future training requirements and works for both water and wastewater operators.

2. Augmented Reservoir Retention Time

The proposed regulations allow a Surface Water Source Augmentation Project (SWSAP) Public Water System to apply to the State Board for a reduced theoretical retention time of less than 180 days, but no less than 60 days (§64668.30 (b)(2)). The District suggests that the section be revised to remove the "no less than 60 days" language. Removal of the language, combined with the remainder of the section would allow greater flexibility for implementing SWSAP, while still being protective of public health. The District suggests that retention times less than 180 days should be evaluated and granted on a case-by-case basis.

Conclusion

We thank the Water Board for its tremendous work in developing the proposed SWA regulations. We believe SWA has the potential to be a safe, reliable, locally-controlled water supply that protects the environment, sustains economic growth, and provides a high quality of life for Californians. We look forward to working with you on refinements to this draft and on building the knowledge base by using our very own SVAWPC. If you have any questions, please contact Mr. Garth Hall, Acting Chief Operating Officer, at (408) 630-2750.

Sincerely,



Norma J. Camacho  
Chief Executive Officer

cc: G. Hall, A. Cheung, K. Oven, G. De La Piedra, A. Alfaro, H. Ashktorab, L. Sangines,  
Z. Helsley

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