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Date October 3, 2018

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA  
95814

**Re: Comment Letter – November 6, 2018 Board Meeting – CWSRF Policy Amendment**

Dear Ms. Townsend,

Heal the Ocean – a Santa Barbara-based citizens’ action group that fights ocean pollution through reduction of ocean wastewater discharges by facilitating wastewater infrastructure upgrades and promoting recycled water programs – appreciates the opportunity to comment on the CWSRF Policy Amendment that will be presented to the State Board at its November 6 meeting.

HTO supports the State Water Board’s effort to restructure the scoring for the CWSRF Fundable List, outlined in Section IV: Program Management. The new, single scoring structure provides a clearer and more efficient framework for prioritizing projects compared to the old system of categories and sustainability points. The single score will provide funding to the most beneficial and deserving projects, regardless of category.

Within the new scoring rubric, HTO would like to offer some suggestions, specifically pertaining to the Primary Scoring outlined in Table 1. While we agree with all of the categories, the Primary Score attributed to Water Recycling projects should be higher. Yes, these projects can only be “improved” at this point; however, recycled water projects can also provide corrective action for multiple resources/impacts listed on Table 1 including:

**Drinking Water Source:** *A Proposed Framework for Regulating Direct Potable Reuse in California*, published by the State Water Resources Control Board in April 2018, adopted regulations for surface water augmentation that “allows for recycled water to be added to a surface water reservoir that is used as a source of drinking water.” Additionally, Assembly Bill 574 requires the State Water Board to adopt uniform water recycling criteria for direct potable reuse through raw water augmentation by December 31, 2023. Within the current framework, recycled water projects can also positively impact Drinking Water Sources

within the next five years. Thus, the priority score for Water Recycling projects should be higher.

**Delta Water Quality:** Every drop of water recycled is one less drop that the State Water Project theoretically has to ship south of the Delta. By reducing the demand for State Water south of the Bay-Delta, that water can be used to maintain flows into the Bay and prevent salt water intrusion, which threatens water for both agricultural and potable use. The *Framework for the Sacramento Delta Update to Bay/Delta Plan* published by The State Water Board in July 2018, "...conclude that water quality and fish resources deteriorate beyond their ability to recover when spring and annual water withdrawals exceed 30 and 40-50% of unimpaired flow respectively." Thus water recycling programs in central and southern portions of the state will decrease the burden of water diversions from the Delta and allow higher unimpaired flows to protect water quality in the Delta region, with the secondary, important, effect being the preservation of fish resources.

Additionally, the US EPA's document *Water Recycling and Reuse: The Environmental Benefits* has identified Water Recycling as a way to decrease diversions of freshwater from sensitive ecosystems. It notes, "The lack of adequate flow, as a result of diversion for agricultural, urban, and industrial purposes, can cause deterioration of water quality and ecosystem health. People who reuse water can supplement their demands by using a reliable source of recycled water, which can free considerable amounts of water for the environment and increase flows to vital ecosystems." The positive, far reaching effects of Recycled Water projects on the water quality of the Delta warrant a higher primary score.

**Impaired Water Body:** According to the US EPA's document *Water Recycling and Reuse: The Environmental Benefits*, Water Recycling has the capacity to decrease discharges to sensitive water bodies. Water recycling reduces or eliminates wastewater discharges into oceans, estuaries and/or creeks. In turn, the Total Maximum Daily Loads (TMDLs) for pollutants are decreased, thus providing corrective action for waters listed on the 303(d) list of impaired water bodies in the state.

Because water recycling addresses multiple, critical water impacts and resources identified by the State Board, the CWSRF Policy Amendment should strongly consider giving Water Recycling projects a higher primary score under the new criteria for Funding List rankings.

Sincerely,



Hillary Hauser, Executive Director



Andrew Juiliano, Policy Analyst