



December 22, 2017

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Sent via e-mail to: commentletters@waterboards.ca.gov

Subject: Comment Letter – Proposed Recycled Water Policy Amendment Early Public Consultation

Dear Chair Marcus and Members of the Board:

The following comments are offered by the Sacramento Regional County Sanitation District (Regional San) on the California Environmental Quality Act (CEQA) scoping and early public consultation for the proposed amendment to the Policy for Water Quality Control for Recycled Water (Recycled Water Policy Amendment or Amendment). Regional San provides wastewater collection, conveyance and treatment for over 1.4 million people in the Sacramento region. On average, we safely treat and discharge 140 million gallons per day (mgd) of wastewater in accordance with our National Pollutant Discharge Elimination System permit. In addition, Regional San currently provides approximately 3.5 mgd of recycled water for beneficial reuse, with an existing water right order to provide up to 10 mgd of recycled water. Regional San is also in the process of constructing its EchoWater Project, a nearly \$2 billion investment that will produce disinfected tertiary treated water suitable for recycling and reuse for a broad range of beneficial uses.

Regional San is an active participant in various regulatory processes such as the Central Valley Salinity Alternatives for Long-Term Sustainability initiative (CV-SALTS) for developing basin-wide Salt and Nutrient Management Plan (SNMP), the Delta Regional Monitoring Program (RMP), and the Delta Nutrient Research Plan efforts, and work collaboratively with multiple stakeholders representing various interests and perspectives.

In general, Regional San is supportive of all State Board efforts in promoting use of recycled water and recognizing it as a valuable resource and so we are offering the following early public consultation comments:

General Comment:

Once the EchoWater Project comes on line in 2023, Regional San is planning for a substantial increase in recycled water reuse. One specific program is the South Sacramento County Agricultural and Habitat Lands Recycled Water, Groundwater Storage, and Conjunctive Use Program (South County Ag Program). This Program will deliver up to 50,000 acre feet of recycled water per year to approximately 16,000 acres of land in southern Sacramento County, near the Cosumnes River, Stone Lakes Wildlife Refuge, and the Cosumnes River Preserve. Since the Program would provide recycled water to these existing agricultural lands that currently pump groundwater, it would reduce withdrawals of groundwater and allow groundwater levels in the Program area to recover. The technical term for replenishment of groundwater through this type of use of recycled water is “In-lieu recharge”, and we urge State Water Resources Control Board (State Board) to use this terminology when discussing this type of recycled water use benefit.

CEC Monitoring Requirement Recommendations:

Regional San applauds the State Water Board for re-convening the Science Advisory Panel to re-evaluate its CEC monitoring recommendations based on currently available information. The panel brings valuable independent expertise to bear on a complicated scientific and policy issue. Regional San attended the December 15 presentation of the Panel's preliminary recommendations and is generally supportive of those recommendations. We understand that the Panel's written report providing CEC monitoring recommendations will be released for public comments in January 2018. Regional San will provide comments on that report.

SNMP Requirement:

Regional San has been actively participating in the CVSALTS process to develop a Central Valley SNMP (CV-SNMP). CVSALTS is a robust stakeholder process led by the Central Valley Regional Water Quality Control Board (Central Valley Water Board). It is anticipated that most provisions of the CV-SNMP will be adopted by the Central Valley Water Board as policy through a Basin Plan amendment (BPA). We encourage the State Board to approve that BPA and certify that recycled water projects in the Central Valley which meet the requirements of the CV-SNMP will be deemed to meet those aspects of the amended Recycled Water Policy pertaining to salts and nitrates.

California Water Code Section 1211

Regional San will review and provide comments on any language in the amended Policy that clarifies the requirements and process related to compliance with Water Code Section 1211.

Priority Pollutant Monitoring for Landscape Irrigation

Regional San encourages the State Water Board to consider the elimination of priority pollutant monitoring for landscape irrigation since California Code of Regulations Title 22 requirements prohibit off-site-runoff of recycled water used for such purposes and any incidental runoff will have minimal impact on water quality or beneficial uses.

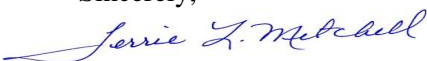
Permit Streamlining Processes:

Regional San supports efforts to streamline permitting processes related to the use of recycled water. However, we also encourage flexibility to allow Regional Boards the ability to continue to issue Master Reclamation permits as appropriate and as requested by the permittee.

We appreciate the opportunity to comment on the CEQA scoping document for the Recycled Water Policy Amendment and will provide additional comments in the future as the proposed policy amendment is released for public review.

If you have any questions please contact me at or 916-876-6092 (mitchellt@sacsewer.com) or Sam Safi at 916-876-6290 (safis@sacsewer.com).

Sincerely,



Terrie L. Mitchell
Manager of Legislative & Regulatory Affairs