SANTA CLARA CALIFORNIA

Santa Clara All-America City 2007

Water & Sewer Utilities

12/4/07 Bd. Mtg.
Water Recycling Policy
Deadline: 10/26/07 Noon

October 26th, 2007

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

SUBJECT: Comment Letter- Proposed Water Recycling Policy

Attn: Jeanine Townsend, Acting Clerk to the Board

The recently proposed Draft Water Recycling Policy by the State Water Resources Control Board, aims to provide guidelines and regulatory limits for recycled water as may be used by State's Regional Water Quality Control Boards. As part of the proposed Policy, a 300 mg/L Total Dissolved Solids (TDS) increase above the "source water supply" limit is proposed.

We agree that salinity management is important for the management of water quality, however to limit the increase to 300 mg/L TDS from a community's water supply to its produced recycled water, would be difficult to implement and is a subjective requirement not always needed or achievable. While we doubt it is the intent of the proposed Policy, this limit would potentially close down existing water recycling projects and stop many new projects form being implemented.

In particular, some specifics issues for the City of Santa Clara:

1. The City of Santa Clara has multiple sources of water with greatly varying water quality parameters: 27 wells, two turnouts from San Francisco (Hetch Hetchy) and Delta water via Santa Clara Valley Water District . The current TDS of our "source waters" range from 50 mg/L to a high of > 400 mg/L. The recycled water is served mostly in the part of the City that receives SFWD water.

2. All of the City of Santa Clara is located over confined aquifers. Our source of drinking water that comes from our wells comes from deep aquifers protected by confining layers of impermeable clays. This fortunate geology has been essential in keeping our groundwater supply from degradation from far worse issues than higher TDS. A more appropriate measure might be an allowable increase above the existing shallow aquifer's TDS.

3. Total Dissolved Solids (TDS) can impact native flora, soil and groundwater, however appropriate environmental protection efforts are dependent on several factors including existing soil properties (including varying permeability), irrigation management, climate and SAR's (sodium absorption

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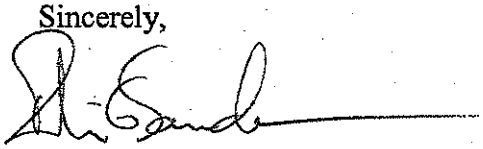
ratios) specific to plant species. It would be difficult to quantify the deleterious impacts TDS may have on flora, soil and potentially groundwater with so many contributing factors. Although we are a proponent of salinity management, to limit a TDS increase to 300 mg/L would be difficult to integrate into recycled water management due to several factors inherent in landscape management, existing soil and groundwater conditions which vary from region to region.

As an alternative to the Policy as written with an apparent requirement to limit the TDS increase of 300 mg/L above our "source water", we suggest the Board encourage and promote local water suppliers to implement best management practices for salinity management. The State Water Resource Control Board's Draft Water Recycling Policy is potentially a beneficial policy; many management practices are already noted in the proposed Policy that are advantageous to the overall growth and management of recycled water in the state of California, however the City of Santa Clara does not support the proposed limit of TDS to an arbitrary increase of 300 mg/L.

Sincerely,



Robin Saunders
Director of Water & Sewer Utilities
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Attachment

cc: Chron File
Alan Kuroturi
Eric Rosenblum, City of San Jose
Pam John, Santa Clara Valley Water District