



June 26, 2018

State Water Resources Control Board
Attn: Felicia Marcus, Water Board Chair and Jeanine Townsend, Clerk of the Board
1001 I Street, 24th Floor
Sacramento, CA 95814

VIA EMAIL: commentletters@waterboards.ca.gov

Re: Comment Letter - Proposed Recycled Water Policy Amendment

Dear Chair Marcus and Ms. Townsend,

On behalf of Padre Dam Municipal Water District, I would like to thank you for the opportunity to provide comments on the Recycled Water Policy amendments to the State Water Resources Control Board. Padre Dam has been a leader in recycled water for over 60 years and is now implementing one of the first surface water augmentation projects in the State - our East County Advanced Water Purification Program which will create up to 30% of East San Diego County's drinking water supply. We would like to thank the Water Board staff for their efforts in updating California's Recycled Water Policy and wish to share our concerns with a few sections of the proposed policy changes.

Bioassay Monitoring for Potable Reuse Projects

The draft Policy includes a new requirement to conduct two bioassays for potable reuse projects. Additionally, the draft Policy requires that a number of "response actions" be taken if the bioassays are above prescribed thresholds. We highly advise the Water Board to follow recommendations from the State Board's CEC Expert Panel that specifically state that regulatory "response actions" are premature and not advised until additional, data collection, research and pilot projects can be performed.

We recommend the State Water Board follow the CEC Panel's recommendations of convening a Bioscreening Implementation Advisory Group, complete a standardization study, and implement the Bioassay testing using a phased approach.

Standardized methods of testing have not been established at this time and therefore the credibility of the results are called into question. Additionally, the availability of labs to complete this work is extremely limited – making it difficult for agencies to implement bioassay testing. We recommend that standardized testing methods be developed by the State through the Environmental Laboratory Accreditation Program (ELAP). The laboratories completing the work need to be credentialed to conduct the adopted ELAP methodology in order to ensure confidence in the lab results. Additionally, statewide guidance for Quality Assurance Project Plans for bioanalytical monitoring using the bioassays is highly encouraged to help ensure a consistent process of sample collection amongst all agencies.

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Salt Nutrient Management Plan

Padre Dam supports the Regional Board's prioritization of Salt Nutrient Management Plan development. Padre Dam was among one of first agencies to develop and submit a SNMP to the Regional Board. However, we believe the inclusion of the Salt Nutrient Management Plans within the Recycled Water Policy is misplaced. Other sources of water including imported water, ag runoff, stormwater carrying nutrient loading from homeless encampments and environmental habitats can also contribute to salt nutrient loading into the groundwater basins. Consequently, Padre Dam's SNMP was limited in its scope, authority, and applicability.

For this reason, we believe this item is better placed as part of the Sustainable Groundwater Management Act adopted in 2016. This would be a more comprehensive approach to managing the State's groundwater basins. We encourage the State Board to engage the Groundwater Sustainability agencies to ensure Salt Nutrient Management Plan objectives are incorporated into groundwater sustainability plans.

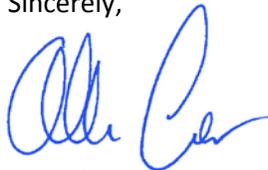
Annual Reporting

Padre Dam appreciates the Water Board staff's efforts in working closely with the recycled water community on annual recycled water reporting. We are supportive of the suggestions within this section of the policy as long as it does not duplicate agencies reporting efforts.

We would like to thank the Water Board staff for their efforts in updating California's Recycled Water Policy and ask that you consider our comments. We believe these suggestions will ensure a Recycled Water Policy that can be followed by agencies throughout the State.

If you or your staff wish to further discuss any of any comments, please contact me at 619-258-4762 or acarlisle@padre.org. Thank you for your consideration of our feedback.

Sincerely,



Allen Carlisle
CEO/General Manager