



*From the Desk of Anthony Serrano*



*Sent Via E-Mail "commentletters@waterboards.ca.gov"*

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

**FROM:** Anthony Serrano, Local Taxpayer  
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**DATE:** Tuesday, June 26, 2018

**SUBJECT:** **Comment Letter – Proposed Recycled Water Policy Statement**

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Thank you for the opportunity to submit comments, I support the use of "recycled water" but the current policy does not require the following items, for proposed wastewater treatment facilities, BEFORE funding is approved for the project:

1. A completed and approved Title 22 Engineering Report to demonstrate how the Project complies with the California Code of Regulations (CCR) Title 22 Recycled Water. The code requires the Engineering Report to be submitted to the State Water Resources Control Board and the Regional Water Quality Control Board for approval prior to producing recycled water for reuse from a water reclamation plant. The purpose of the Engineering Report is to request regulatory approval for the Project and to form the basis for its NPDES permit,
2. Prior to submitting the DRAFT Engineering Report for approvals will include a record confirming all "Public Comments/Questions" have been responded to in writing and included,
3. The DRAFT Engineering Report submitted for approvals will include financial supporting documents for the following: a) cost-benefit analysis with rate of return, b) amortization schedule for term of the loan repayment period and copy of loans documents, c) ramp-up schedule for term of the loan listing the annual capital costs, maintenance costs, and human capital costs, and d) post-audit schedule to evaluate if the cost-benefit of the project was achieved and within budget,
4. The financial documents listed will be signed under penalty of perjury for each of the following: cost-benefit analysis with rate of return, b) amortization schedule for term of the loan repayment period and copy of loans documents, c) ramp-up schedule for term of the loan listing the annual capital costs, maintenance costs, and human capital costs, and d) post-audit schedule to evaluate if the cost-benefit of the project was achieved and within budget, and
5. The Policy will include a financial penalty to insure the local ratepayer will be reimbursed, by the Manager and Board Members of the water district, if the Project fails to pass the financial document for: d) post-audit schedule to evaluate if the cost-benefit of the project was achieved and within budget. The ratepayer should not be required to repay a construction loan or suffer from increased monthly rates for service if management has delivered a poor wastewater treatment facility.

Based on this information, the Policy should be that NO proposed wastewater treatment facility can be funded PRIOR to a Title 22 Engineering Report is approved by the State Water Resources Control Board and the Regional Water Quality Control Board.

Thank you.

C: Ms. Laura McLellan via email