



RAYMOND BASIN MANAGEMENT BOARD

June 25, 2018



City of Alhambra
City of Arcadia
California-American
Water Company
East Pasadena
Water Company
H.E. Huntington Library
and Art Gallery
Kinneloa Irrigation
District
La Cañada Irrigation
District
Las Flores Water
Company
Lincoln Avenue
Water Company
Pasadena Cemetery
Association
City of Pasadena
Rubio Cañon Land and
Water Association
San Gabriel County
Water District
City of Sierra Madre
Sunny Slope
Water Company
Valley Water Company

State Water Resources Control Board
Attn: Ms. Jeanine Townsend, Clerk to the Board
1001 I Street, 24th Floor
Sacramento, CA 95814

RE: Comment Letter – Proposed Recycled Water Policy Amendment

Dear Ms. Townsend:

The Raymond Basin Management Board (RBMB) is the Court-appointed agency which manages the surface water and groundwater supplies of the Raymond Basin and its Relevant Watershed. In that capacity, RBMB was the lead agency to coordinate, prepare and submit the “Salt and Nutrient Management Plan” (SNMP) for the Raymond Basin which was required by the “Recycled Water Policy” adopted in 2009. The SNMP for the Raymond Basin was approved by the State Water Resources Control Board (SWRCB) on May 16, 2017. RBMB has had an opportunity to review the draft document entitled “Amendment to the Policy for Water Quality Control for Recycled Water” and provides the following comments.

General Comments

Although maintaining some of the original elements from the 2009 Recycled Water Policy, the draft 2018 Recycled Water Policy appears to be re-written in its entirety. This creates a challenge to clearly discern whether prior submittals (including the SNMP) will be affected under the amended Recycled Water Policy, if adopted. It would be beneficial to have a definitive statement in the draft Recycled Water Policy that an approved SNMP, or other SWRCB documents, is not subject to revision for at least 10 years following the date of adoption. This would be consistent with Section 6.1.3 requiring each regional board to evaluate the need for salt and nutrient planning.

In addition, RBMB's downloaded copy of the draft 2018 Recycled Water Policy included numerous areas where "...pursuant to 0..." is referenced, e.g. Sections 6.2.6, 7.1.2, and 8.2.2, among others. Although this appears to be a place-holder, it would be beneficial to enter the appropriate sections intended to be referenced and provide a time extension for public review so that the draft document may be reviewed in context.

Specific Comments

1. Section 5.2 states in part "...determine that the proposed change will not injure any other legal user of the water involved, will not unreasonably affect instream users involving fish and wildlife, and is in the public interest." This section appears to be in conflict with itself. There likely are, or may be, circumstances when the legal user of the water already is authorized to make a discharge to a certain reach of a river/stream and is simply making a request to change the point of release. Failure to authorize a change petition may result in injury to the legal user in favor of continuing releases for fish and wildlife. Furthermore, continued releases for fish and wildlife may adversely impact the stated goal in Section 3.1.1 to increase the use of recycled water to 2.5 million acre-feet per year by 2030. Consequently, it is suggested additional language be included to limit the quantity of recycled water to be set aside for fish and wildlife in favor of recycled water reuse, particularly where recycled water is essentially the only water in the stream/river channel, and effectively artificially creates habitat.
2. Section 6.2.11 states in part "...the salt and nutrient management plans may address constituents other than salts and nutrients..."
RBMB suggests this language be clarified to say "may, but is not required to, address..."
3. Section 6.2.6
RBMB requests the bullet "potential new data gaps" be removed.

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The Raymond Basin Management Board appreciates this opportunity to comment on the draft 2018 Recycled Water Policy. Please feel free to contact me should you wish to discuss our comments or require clarification.

Sincerely,

RAYMOND BASIN MANAGEMENT BOARD

A handwritten signature in blue ink, appearing to read 'A. Zampello', written in a cursive style.

Anthony C. Zampello
Executive Officer