Public Comment
Proposed Recycled Water Policy Amendment
Deadline: 6/26/18 by 12 noon

City of Santa Rosa WATER

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Delivered via email to: commentletters@waterboards.ca.gov

Jeanine Townsend
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

RE: Proposed Recycled Water Policy Amendment

Dear Ms. Townsend:

On behalf of the City of Santa Rosa Water Department, I am writing to provide input and comments on the proposed amendments to the Recycled Water Policy (Policy). The City of Santa Rosa is the owner and operator of the Santa Rosa Subregional Water Reuse System (Subregional System), one of the largest water recyclers in the State. The Subregional System produces high-quality tertiary treated recycled water for urban and agricultural irrigation, irrigating many schools, parks and businesses, as well as approximately 6,000 acres of farmlands and vineyards. The Subregional System also supplies recycled water to the Geysers Recharge Project, providing, on average, 13 million gallons of recycled water per day to the Geysers steamfields, where it is used to produce "clean" electricity for up to 100,000 households in the North Bay Area. Depending upon the amount of rainfall in any given year, between 95 and 100 percent of the Subregional System's wastewater is recycled.

Santa Rosa Water supports the State Water Board's effort to promote the use of recycled water through the Recycled Water Policy. Our below comments provide suggestions on how to further streamline recycled water planning and permitting as well as encourage new recycled water projects.

1. **The Policy should minimize duplicative reporting requirements**
   Santa Rosa Water supports the centralization and streamlining of recycled water reporting; however, benefits of doing so may be lost if other avenues of reporting are not discontinued.

   Rather than creating a new database system, the State Water Board should consider implementing recycled water reporting via CIWQS. Many agencies, under their NPDES permit or Water Discharge Requirements (WDR), are already required to report some data using CIWQS. Instead of requiring double reporting, the State should integrate future reporting requirements into the existing reporting system. In addition to tracking progress towards statewide goals, having centralized, reliable recycled water data from agencies will be instrumental in regional water management planning.

Santa Rosa Water appreciates that the Board recognizes the limitation of current recycled water reporting methods, specifically that the survey conducted every few years by the Department of Water Resources (DWR) is "infrequent, labor intensive and time consuming, and challenging for both permittees and staff." While we recognize that the Board does not have authority over DWR, we urge the Board to collaborate with DWR and include language in the Proposed Amendment, similar to Section 3.4, which states: "The State Water Board requests that DWR work with the State Water Board to develop a reporting database and discontinue its recycled water survey."

2. **The requirement for Salt and Nutrient Management Plans (SNMPs) should be removed from the Policy**

   The existing Policy states that every groundwater basin in California should have a SNMP, and set a deadline for the establishment of a SNMP. Protection of groundwater from adverse salinity and nutrient impacts is appropriate, but recycled water is not typically the primary source of salinity or nutrients in groundwater basins. Therefore, inclusion of the SNMP requirements within the Recycled Water Policy is misplaced. The passage of the Sustainable Groundwater Management Act (SGMA) in 2014 appeared to be an opportunity to incorporate SNMPs into SGMA plans and reduce overlapping groundwater planning efforts. However, the objectives of the SNMP and SGMA are not identical and exist within different statutory frameworks and agencies.

   The draft proposed amendment requires Regional Boards to evaluate and prioritize groundwater basins for SNMP development based on the United States Geological Survey's (USGS) Groundwater Ambient Monitoring and Assessment (GAMA) Program, SGMA, or more region-specific factors in basin evaluation that better represent the conditions of the region. This proposed change recognizes the importance of providing flexibility at the regional level to evaluate the need for SNMPs.

   The development and implementation of SNMPs should be a part of a larger stakeholder effort to manage the quantity and quality of groundwater in California. In fact, the draft amendment encourages water and wastewater entities, together with local salt and nutrient contributing stakeholders, to collaboratively develop SNMPs for groundwater basins, as required. The passage of SGMA in 2014 created this opportunity and provided the means to move the salt and nutrient management planning component out of the Policy and into SGMA, where stakeholders can work collaboratively to manage salts and nutrients on a basin-wide or watershed-wide basis.

   Santa Rosa Water disagrees with the Board's recommendation to keep the SNMP program housed within the Recycled Water Policy rather than migrating it into SGMA. We believe incorporating SNMP into SGMA is a more appropriate program and pathway to develop and successfully achieve the goals of salt and nutrient management planning and reduce overlapping groundwater quantity and quality planning. For the above reasons, we recommend that the Policy require the State Water Board to work with DWR and other stakeholders to develop a policy or agreement for migrating the SNMP into SGMA.

3. **Priority pollutant monitoring should be removed from the State General Order**

   The proposed amendment removes the monitoring requirements for priority pollutants from the Recycled Water Policy. Water Board staff reviewed priority pollutant monitoring data and concluded that exceedance rates are extremely low. Priority pollutants are largely industrial chemicals whose uses have diminished since they were incorporated into regulation decades ago. The Proposed

Amendment correctly shifts monitoring resources from historic pollutants to emerging contaminants and their potential impacts in potable recycled water projects. Additionally, priority pollutant monitoring in recycled water is already a requirement in publicly owned treatment facilities' NPDES permits or WDR.

Santa Rosa Water appreciates the removal of duplicative monitoring requirements; however, recommends that prior to any deadline requiring the enrollment of new permittees, the Monitoring and Reporting Program in Order WQ 2016-0068-DDW be revised to remove priority pollutant monitoring as well.

Thank you for the opportunity to provide input and comments on Recycled Water Policy Proposed Amendments as well as your leadership in this matter.

Sincerely,

Ben Horenstein

Bennett Horenstein
Director of Water, City of Santa Rosa