



June 26, 2018

Felicia Marcus
Chair, State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Sent via email – Recycled Water Policy Comments

Dear Chair Marcus:

On behalf of El Dorado Irrigation District (District), thank you for the opportunity to submit comments on the draft amendments to the Recycled Water Policy (Policy). The District's water recycling program began in the late 1970's. Today, the District produces tertiary treated, disinfected, non-potable recycled water for landscape use and distributes recycled water to over 5,400 accounts. Over 5,000 of those accounts are dual-plumbed residential that provide recycled water to our customers on the western slope of El Dorado County. The District has one of the largest and most successful dual-plumbed programs in the State, and we continue to expand our recycled water program every year.

The District appreciates the time and effort spent developing the revised Policy. I have attended the scoping and stakeholder meetings and provided input to staff at these meetings. Per the Board's request at the June workshop, the District has identified aspects of the draft Policy that are of significant concern to the District, and our comments are intended to develop Policy language that will provide a path to increase future recycled water project development and production.

First, we are supportive of the annual recycled water reporting requirements included in the Policy. However, we request that the monthly reporting for municipal wastewater treatment plant influent, recycled water production and distribution data be modified to require reporting of quarterly data in an annual report at one time per year instead of setting a monthly report schedule. The District conducts recycled water meter reads and customer billing on a bimonthly basis. Therefore, we do not readily have recycled water monthly production and distribution data available. The monthly reporting would require ongoing additional staff time and programming changes to our customer billing database, resulting in additional expenses to our recycled water program that would ultimately burden our customers with higher recycled water rates. We believe reporting of quarterly data in an annual report will streamline staff time and provide information that could be analyzed on a seasonal basis. Additionally, we ask that all other duplicative tracking of recycled water uses be discontinued.

Secondly, we disagree with the inclusion of the new Policy goal to *Minimize the direct discharge of treated municipal wastewater to enclosed bays, estuaries and coastal lagoons, and ocean waters, except where necessary to maintain beneficial uses*. By including this goal, it is



has underlying meaning that one form of water recycling is more important than others. All forms of recycled water in the State important and all contribute to overall production goals. Additionally, this language could have unintended consequences in later years; such as grant and loan funding allocation. We request that this new goal is either removed from the Policy entirely or the language moved to the Benefits section.

Third, the draft Policy requires that all old engineering reports (before 2000) be reviewed and updated in two years. If engineering reports need to be updated and approved, we ask that language is included in the Policy allowing projects to continue while the engineering reports are updated. In addition, the Policy should allow the District to maintain coverage under its master reclamation permit outside of the 2016 General Order.

Lastly, the District requests that the Board revise the schedule for adoption of the Policy. Sufficient time should be allowed to work with State Water Board staff on the issues that were commented on at the public hearing in June. Working through these issues and developing the final Policy language should continue in a collaborative manner. A Recycled Water Policy that streamlines the permitting of projects, recognizes the importance of all forms of recycled water, reduces duplicative reporting efforts, utilizes the recommendations of the CEC panel, and encourages future recycled water funding, will lead to a much larger portfolio of recycled water in the State. The District is committed to working with the State Water Board to develop a policy that advances the goal of increasing the use of recycled water.

Sincerely,

A handwritten signature in green ink that reads 'Elizabeth Dawson Wells'. The signature is fluid and cursive, with the first name being the most prominent.

Elizabeth Dawson Wells, P.E.
Engineering Manager

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