



## San Diego County Water Authority

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June 26, 2018

### MEMBER AGENCIES

- Carlsbad Municipal Water District
- City of Del Mar
- City of Escondido
- City of National City
- City of Oceanside
- City of Poway
- City of San Diego
- Fallbrook Public Utility District
- Helix Water District
- Lakeside Water District
- Oliverain Municipal Water District
- Otay Water District
- Padre Dam Municipal Water District
- Comp Pendleton Marine Corps Base
- Rainbow Municipal Water District
- Rancho Municipal Water District
- Rincon del Diablo Municipal Water District
- San Dieguito Water District
- Santa Fe Irrigation District
- South Bay Irrigation District
- Vallecitos Water District
- Valley Center Municipal Water District
- Vista Irrigation District
- Yuma Municipal Water District

### OTHER REPRESENTATIVE

- County of San Diego

**The Honorable Felicia Marcus, Chair**  
**c/o Jeanine Townsend, Clerk to the Board**  
**State Water Resources Control Board, Division of Financial Assistance**  
**1001 I Street, 24th Floor**  
**Sacramento, CA 95814**

**Subject: Comment Letter – Proposed Recycled Water Policy Amendment**

**Dear Chair Marcus:**

Thank you for the opportunity to comment on the draft Amendment to the Policy for Water Quality Control for Recycled Water. The Water Authority is a wholesale water supplier in San Diego County with 24 retail member agencies. Recycled water is an important component of the San Diego region's water supply mix. Over half of our member agencies produce or use recycled water in their service areas, and several of our member agencies have potable reuse projects in the planning and design phases.

We appreciate efforts by State Water Board staff during development of this amendment to meet with water agencies and stakeholders through various meetings and workshops. We support many of the proposed changes to the Policy, which we believe will further the goal of increasing recycled water use in California. We also offer the following recommendations on areas that we think should be changed in the final Amendment to the Policy.

**Remove goal to minimize wastewater discharges:** The draft Amendment includes a new goal to minimize direct discharge of treated municipal wastewater to enclosed bays, estuaries and coastal lagoons, and ocean waters, except where necessary to maintain beneficial uses. While the use of recycled water will reduce discharge of treated municipal wastewater, we recommend that this should be identified as a benefit of using recycled water rather than as a goal. We support recommendations made by WateReuse California that the Policy only include the goal of encouraging the safe use of recycled water.

*A public agency providing a safe and reliable water supply to the San Diego region*

Streamline reporting: We support the intent of the Amendment that reporting on municipal wastewater treatment plants and recycled water production and use should not be duplicative between the State Water Board and the Regional Water Board. Currently, municipal wastewater treatment plant operators provide reporting through the state's California Integrated Water Quality System (CIWQS). We ask the State Water Board to also consider that using a single database for reporting would improve efficiency by recycled water agencies that are also wastewater agencies. We encourage the State Water Board to work with stakeholders when setting up the data entry parameters to ensure that the database structure can adequately reflect the complex relationships among agencies for recycled water production and distribution.

Salt and nutrient management plans: We support the additional flexibility provided in the draft Amendment for Regional Water Boards to evaluate individual basins to determine the need for SNMPs, and to prioritize their development. Following the 2009 Policy Amendment, the Water Authority and its member agencies worked with the San Diego Water Board to develop guidelines establishing a standardized approach and framework for developing SNMPs within the San Diego Region. These guidelines were endorsed by way of a San Diego Water Board resolution in November 2010, and have been implemented in the region.

Development of SNMPs should be coordinated with Groundwater Sustainability Plans under the Sustainable Groundwater Management Act where appropriate. We support the functional equivalency approach identified in section 6.2.1.4 related to development of SNMPs.

Under section 6.2.4.1, it is not clear who is responsible for developing and implementing a basin monitoring plan. Responsibility for monitoring should not be placed solely on recycled water agencies. They should also not be held responsible for ensuring that monitoring occurs by other stakeholders, nor do they have this authority. The Amendment should be clear that all stakeholders in the basin will be held equally responsible for monitoring.

Permitting recycled water projects under master reclamation permits: In the San Diego region, most recycled water agencies have master reclamation permits that provide coverage for a combination of recycled water treatment, use, and disposal. Since the statewide general permit for recycled water does not provide this level of coverage, agencies with master reclamation permits in San Diego that might enroll under the state permit would still require an additional permit. Coverage under multiple permits requires more resources and is less streamlined than coverage under a single master permit. While we understand from the staff report that the intent of the Amendment is to provide flexibility in allowing agencies to continue to be covered under regional master reclamation permits, we think this should be made clearer in the amendment, and provide suggested language to section 7.3.2.2.2 in an attachment to this letter. If the long-term goal is for all recycled water agencies to be covered by a single general permit, we recommend that treatment be added to the statewide permit during a future permit update.

CEC bioassay monitoring for potable reuse projects: In its 2018 Final Report: Monitoring Strategies for Constituents of Emerging Concern in Recycled Water, the Science Advisory Panel recommends that bioanalytical monitoring for potable reuse projects be conducted over a three to five-year period with no required response actions during this time due to the current state of knowledge and experience in this field related to recycled water. The Panel also recommends convening over this same period a bioscreening implementation advisory group to help develop protocols and guide utilities through the initial data collection period. We ask that the amendment be revised to reflect these recommendations by the Panel.

Requiring response actions by water utilities is premature before bioassay methods are standardized and health implications are better understood. The staff report provides no scientific basis for this requirement. The Water Board is currently funding a study with the Water Research Foundation that involves standardization and validation of bioanalytical tools for recycled water. Following completion of this study, standardized methods for utilizing bioassays should be developed by the state through the Environmental Laboratory Accreditation Program (ELAP). In addition, the State Water Board should lead an effort with the bioscreening implementation advisory group to develop statewide guidance for Quality Assurance Project Plans for bioanalytical monitoring using the recommended bioassays. Finally, there is limited understanding about the relationship between exceedances of bioassay monitoring thresholds and impacts on human health. The state's Office of Environmental Health Hazard Assessment should be involved in evaluating the links between bioanalytical monitoring of CECs in drinking water and human health risks.

We recommend that the staff report clarify that costs for bioanalytical monitoring presented in Table 4-6 of the staff report do not include additional costs that will be required by utilities for personnel training and time to conduct bioassay monitoring.

Provide additional clarity to Amendment language

We recommend simplifying language in the draft Amendment to improve clarity, particularly related to SNMPs, the antidegradation policy, and reporting requirements for producers and municipal wastewater treatment plants.

Thank you for your consideration of our comments. Please contact Lesley Dobalian with any questions at (858) 522-6747, or [LDobalian@sdewa.org](mailto:LDobalian@sdewa.org).

Sincerely,



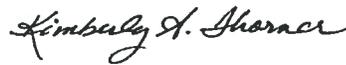
Robert R. Yamada  
Director of Water Resources  
San Diego County Water Authority



Brian Olney  
Director of Water Quality and System  
Operations  
Helix Water District



Allen Carlisle  
CEO/General Manager  
Padre Dam Municipal Water District



Kimberly A. Thorner  
General Manager  
Olivenhain Municipal Water District



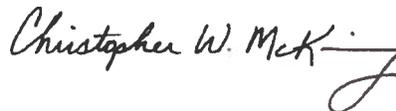
Cari Dale  
Water Utilities Director  
Water Utilities Department  
City of Oceanside



Cor Shaffer, PE, T5, D5  
Operations Manager  
Santa Fe Irrigation District



Mark Watton  
General Manager  
Otay Water District



Christopher W. McKinney  
Director of Utilities  
City of Escondido

Attachment

Sent via Electronic Mail: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**Attachment**  
**Recommendations for Specific Changes to the draft Amendment and Attachment A**

6.1.3. Add additional factors to be considered in development of SNMPs, which are identified in the staff report:

- Important hydrologic factors, such as regional aquitards, depth to water, natural formations, and other region-specific factors
- Existing groundwater quality
- Consideration of GAMA or CASGEM basin prioritization

6.2.1.2. Revise as shown in red underline and strikeout:

The State Water Board recognizes that in some parts of the state ~~because~~ stormwater is typically may be lower in nutrients and salts and can be used to augment local water supplies...

6.2.4.1.3. Add the following language:

Where applicable, the Regional Water Board will assist by convening stakeholders and ensuring that all other dischargers in the relevant basin are participating in the monitoring program.

7.3.2.2.2. Revise as shown in redline:

The regional water board shall make a finding of unusual circumstances in a site-specific permit pursuant to 7.3.3, resolution or other order based on substantial evidence in the record if the regional water board determines that unusual circumstances apply, after public notice and hearing. Unusual circumstances may include coverage under a regional master recycling permit.

Attachment A. Tables 5 and 6:

Remove footnote 1 under monitoring frequency for bioanalytical screening tools.

Attachment A. Delete Tables 8 and 10, and section 5.3 Evaluation of Bioanalytical Screening Tool Results.