



February 11, 2019

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

Dear Chair Marcus:

At the adoption hearing for the “Policy for Water Quality Control for Recycled Water” (Policy), the issue was discussed of how to best recognize benefits of environmental uses of recycled water. You and your colleagues recognized that recycled water use in natural systems and habitat supports beneficial uses and should not be characterized as primarily a discharge of waste.

Since the approval of the Policy, we have been thinking about how to recognize these environmental benefits of recycled water within the current reporting requirements contained within the Policy. We are writing to request a minor, yet important adjustment in the way “discharges” of wastewater are reported under the Policy, as adopted in December 2018.

Section 3.2.2 of the Policy specifies that agencies report the monthly volume of treated wastewater under a category of “discharge”, even if that wastewater is going for beneficial uses such as enhancement of natural systems, wetlands and wildlife habitat. The section reads as follows:

Section 3.2.3. Discharge. Monthly volume of treated wastewater discharged to each of the following, specifying level of treatment:

Inland surface waters, specifying volume required to maintain minimum instream flow.

Enclosed bays, estuaries and coastal lagoons, and ocean waters.

Natural systems, such as wetlands, wildlife habitats, and duck clubs, where augmentation or restoration has occurred, and that are not part of a wastewater treatment plant.

Underground injection wells, such as those classified by U.S. EPA’s

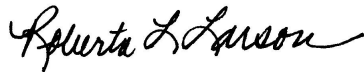
Underground Injection Control Program, excluding groundwater recharge via subsurface application intended to reduce seawater intrusion into a coastal aquifer with a seawater interface.

Land, where beneficial use is not taking place, including evaporation or percolation ponds, overland flow, or spray irrigation disposal, excluding pasture or fields with harvested crops.

We understand these uses are not specified under Title 22 and therefore do not belong in the Recycled Water reporting section. Yet, many of these discharges support “beneficial purposes” and **also** do not belong under the category of “discharge.” As written, it would be very easy to make generalizations that none of the wastewater in this category is beneficially reused. Agencies using wastewater to support beneficial uses should be allowed to properly recognize and describe these uses to their ratepayers and the public.

We ask that you create a separate reporting category entitled “Other Beneficial Uses” for wastewater discharges supporting these purposes. We do not think this would add to the reporting burden and it would help the public understand this critical distinction. We understand that under the Policy the Executive Director can make adjustments to the reporting requirements. We hope you will consider our request and we would be happy to discuss this with you further.

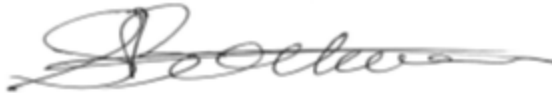
Sincerely,



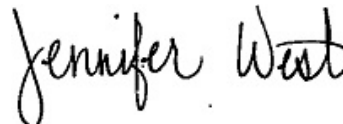
Roberta Larson
Executive Director
California Association of Sanitation Districts



Paul A. Cook
General Manager
Irvine Ranch Water District



Sean Bothwell
Executive Director
California Coastkeepers Alliance



Jennifer West
Managing Director
WaterReuse California

cc: Eileen Sobel, Executive Director
Members, State Water Board