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Public Comment
Proposed Recycled Water Policy Amendment
Deadline: 12/22/17 by 12 noon

General Manager
Kimberly A. Thorner, Esq.
General Counsel
Alfred Smith, Esq.

December 22, 2017

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



VIA EMAIL: commentletters@waterboards.ca.gov

Re: Comment Letter – Proposed Recycled Water Policy Amendment Early Public Consultation

Dear Ms. Townsend,

On behalf of Olivenhain Municipal Water District, thank you for the opportunity to provide the State Water Resources Control Board with input on the proposed Recycled Water Policy amendments. OMWD provides 84,000 customers in northern San Diego County with water, wastewater, recycled water, hydroelectric, and recreational services.

Recycled water accounts for approximately 15 percent of OMWD's supply, and is used primarily for landscape irrigation for schools, homeowner associations, parks, and recreational areas. Additionally, OMWD offers free recycled water to its residential customers by operating a recycled water fill station, allowing customers up to 300 gallons per visit, with no limit on the number of visits.

OMWD recognizes the need to amend the Recycled Water Policy to make updates that reflect current regulations, as well as to provide clarifying language related to compliance. Given the past investments to develop this drought-resilient supply that decreases potable water demand and increase supply reliability, OMWD asks that consideration be made when developing these proposed amendments to avoid changes that would restrict recycled water use or serve as a disincentive for its development. This request is consistent with the first project goal to "Support the increased use of recycled water [...] to mitigate the effects of long-term drought, climate change, and water supply uncertainty." Additionally, OMWD offers the following specific recommendations.

1. When proposing amendments for monitoring requirements of CECs, please consider that the "CEC Advisory Panel provided recommendations for monitoring specific CECs in recycled water used for groundwater recharge reuse. Monitoring of health-based CECs or performance indicator CECs is not required for recycled water used for landscape irrigation due to the low risk of ingestion of the water" (Order WQ 2016-0068-DDW). Monitoring CECs in recycled water used for landscape irrigation is likely to be more burdensome than beneficial, especially when one considers the relative risk when compared to other compounds frequently used on landscapes, such as fertilizers, herbicides, and pesticides.
2. Amendments to reporting requirements should consider what reports are currently being required at the local level. Regional reporting requirements should be considered when developing any state-level reporting requirement to avoid redundant reports.



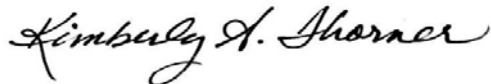
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3. When determining the frequency for the requirement to update salt and nutrient management plans, we suggest that an update every five years is appropriate, which follows the frequency of updating urban water management plans.
4. OMWD is in support of the removal of priority pollutant monitoring due to potential contamination from incidental runoff. Regulations that prohibit the runoff of recycled water currently exist, and cases of incidental runoff are infrequent and promptly rectified.

If you or your staff should need any additional details pertaining to this assessment, please do not hesitate to contact me at 760-753-6466 or kthorner@olivenhain.com.

Regards,

A handwritten signature in cursive script that reads "Kimberly A. Thorner".

Kimberly A. Thorner
General Manager

CC: Mark Muir, Board Chairman, San Diego County Water Authority
Dave Bolland, Director of Regulatory Relations, Association of California Water Agencies