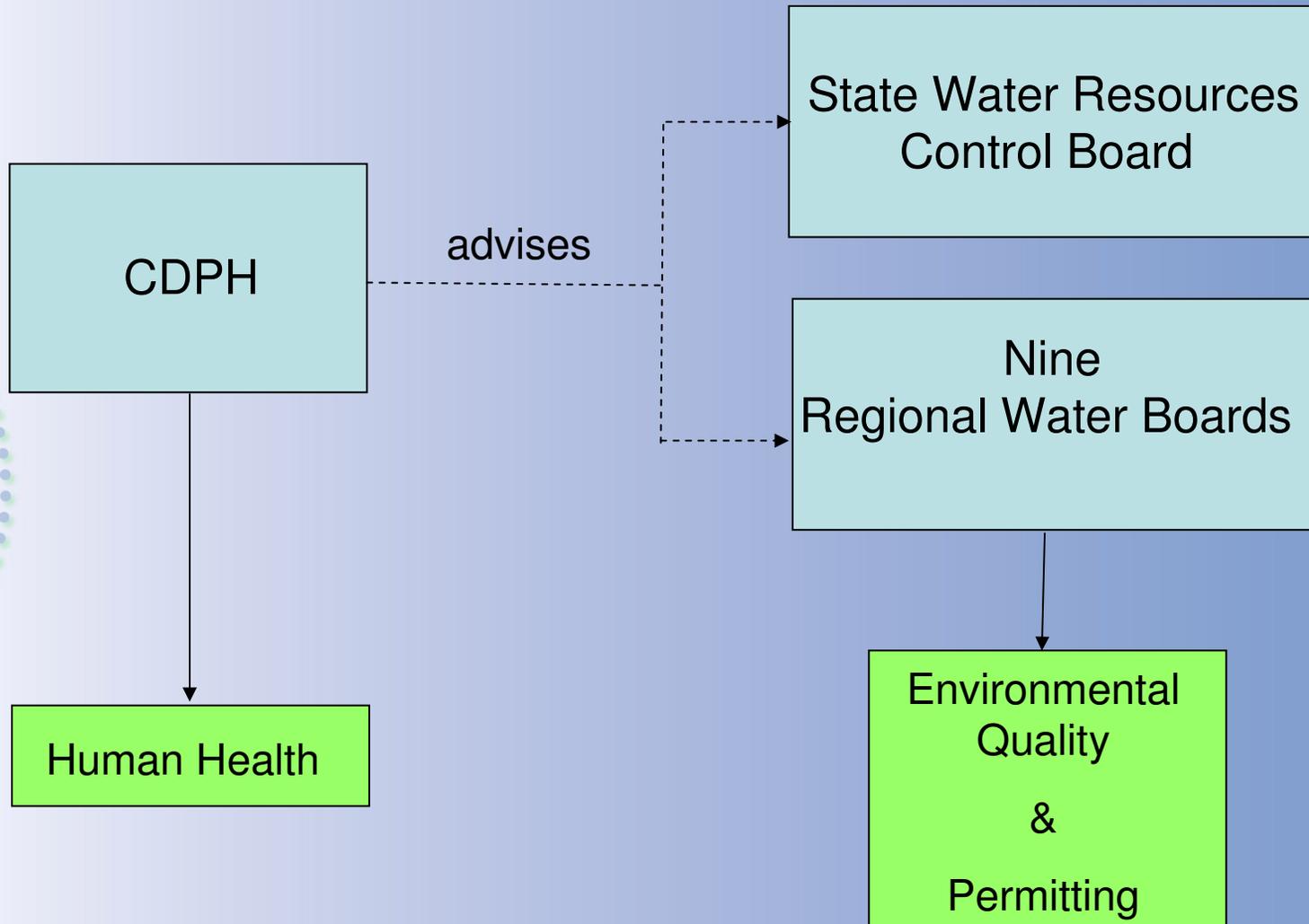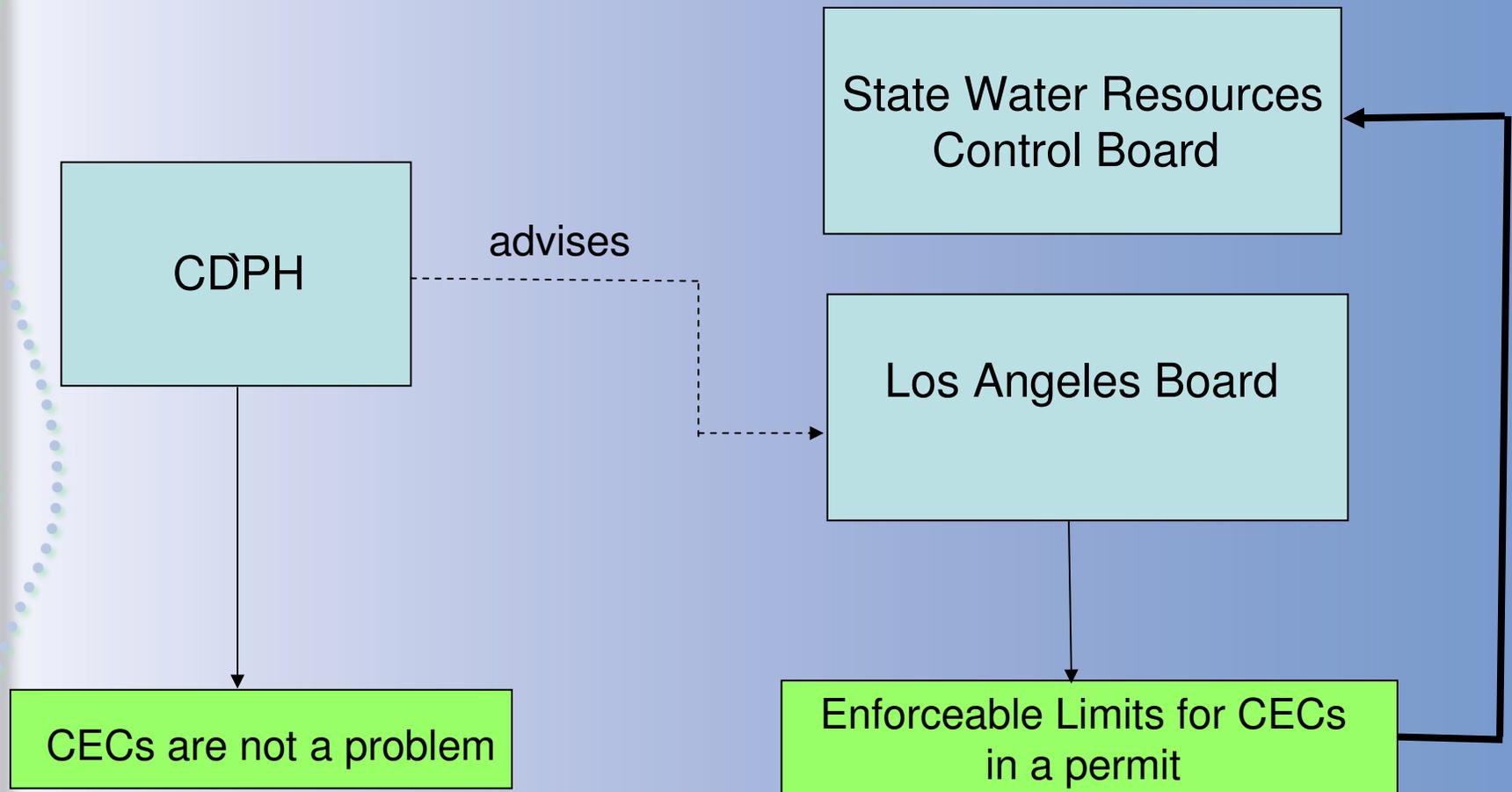# Recycled Water Policy Intent

How Did We Get Here and How is this Going to Impact Local Water Resource Development Projects?

California's permitting structure is byzantine and frustrates project development

The Los Angeles Regional Board was "ground zero" for issues related to agency primacy and the safety of recycled water

State Water Resources Control Board

CDPH

advises

Los Angeles Board

CECs are not a problem

Enforceable Limits for CECs in a permit

SWRCB reversed the permit decision and had a really bright idea

State Water Resources Control Board

We Need a Policy !

CDPH had Primacy Over Human Health Effects

Development of the Policy through the "normal" process didn't work

Limits Recycling

This is worse

1st Staff Draft

2nd Staff Draft

We Can Do This Ourselves !

Not Protective Enough

This is worse

Legal & regulatory positions advanced by the water community

❖ Resolution 68-16 analysis for irrigation is unnecessary

❖ Incidental runoff can be handled with MS4s

❖ Salt management only for recycled water projects is inappropriate

❖ CDPH has primacy over public health issues

Recycled Water is a resource not a waste

Legal & regulatory positions advanced by the environmental community

❖ Any discharge requires an individual NDPES permit

❖ Resolution 68-16 analyses are ALWAYS required

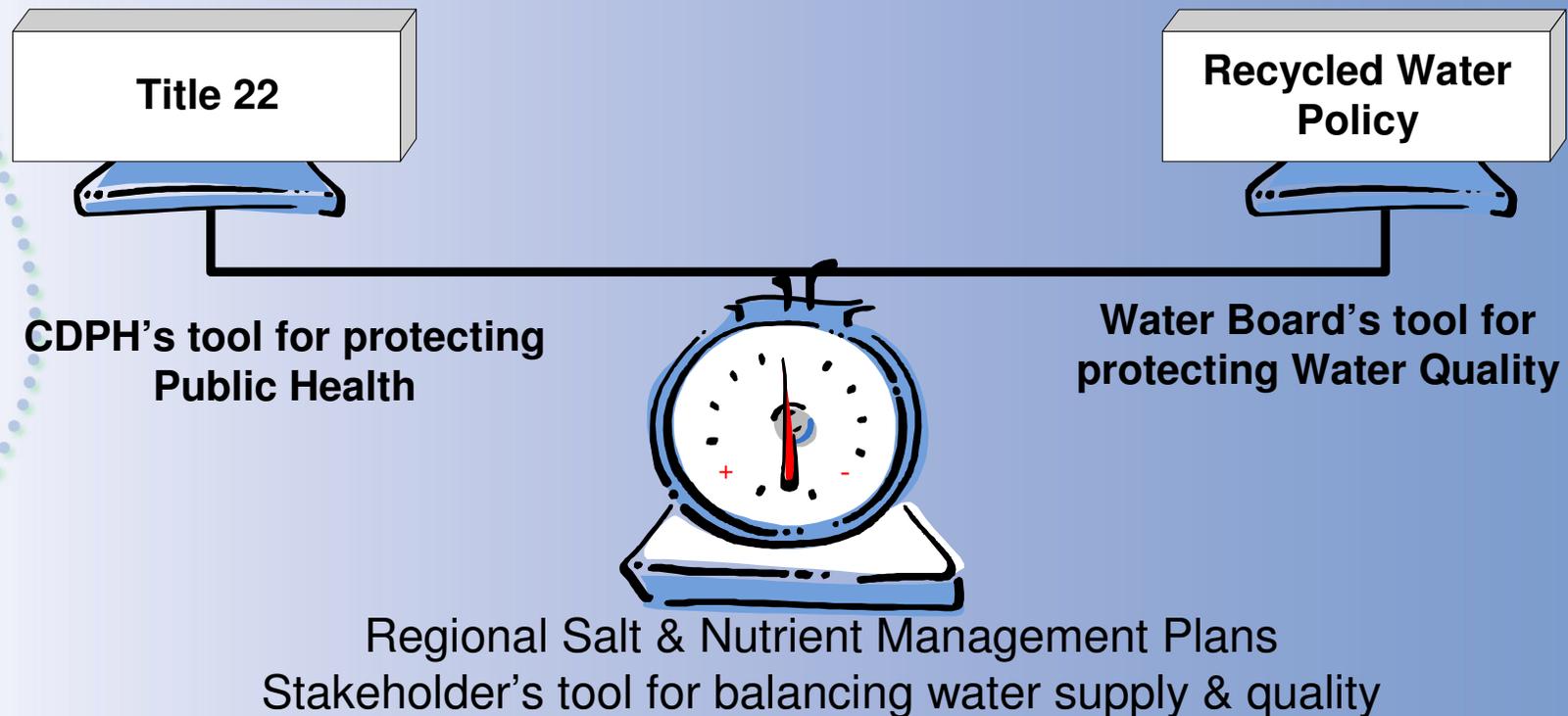❖ Regional boards should be able to set public health standards in absence of CDPH regulations

Supply driven projects compromise water quality
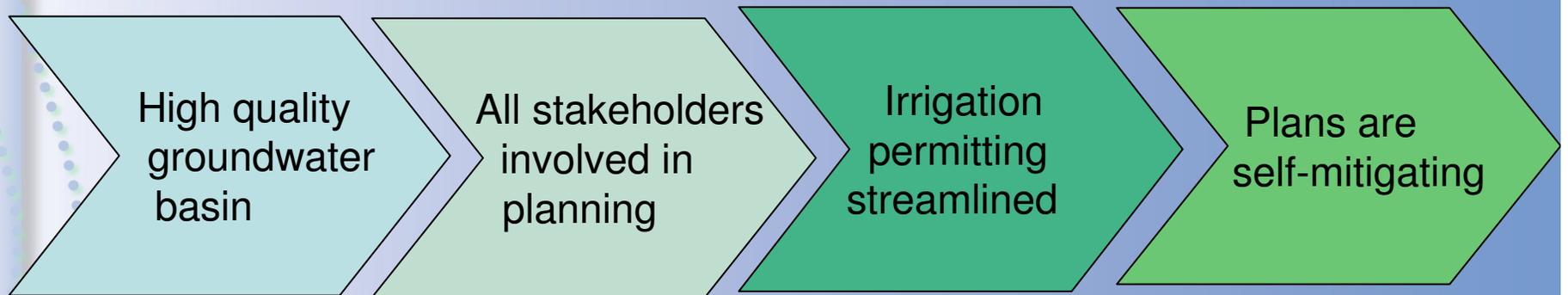
Common ground

❖ Recycled water WILL play a larger role in the state's supply

❖ California needs a portfolio approach that matches water quality to intended use

❖ The Policy should guide decisions not specifies results

Structure that worked in the Policy negotiations

Title 22

Recycled Water Policy

CDPH's tool for protecting Public Health

Water Board's tool for protecting Water Quality

Regional Salt & Nutrient Management Plans
Stakeholder's tool for balancing water supply & quality

Under the umbrella...
salinity management & streamlined permitting

High quality groundwater basin → All stakeholders involved in planning → Irrigation permitting streamlined → Plans are self-mitigating

Quick overview of the Policy's eleven sections

❖ **Preamble:**

  ◆ Recycled water use is safe, sustainable and should be encouraged

❖ **Purpose:**

  ◆ The Policy will guide Regional Board permitting decisions

❖ **Benefits of Recycled Water:**

  ◆ Recycled water use consistent with the Policy has a beneficial impact on the environment

Quick overview of the Policy's eleven sections

❖ **Mandates:**

  ◆ Recycled water use needs to be increased and that means we all need to "play nicely" together

❖ **Agency Roles:**

  ◆ CDPH is authority on public health (regional boards can't make up numbers)

❖ **Salt & Nutrient Management Plans:**

  ◆ Local agencies will lead the preparation of these plans to provide for both water supply and water quality

Quick overview of the Policy's eleven sections

❖ **Irrigation:**

◆ Irrigation use should be easy and permitting should be streamlined in most cases

❖ **Groundwater Recharge:**

◆ Groundwater recharge projects continue to require individual review

❖ **Anti-Degradation:**

◆ Salinity Management Plans are the long-term solution but in the short-term an abbreviated analysis for irrigation is appropriate

Quick overview of the Policy's eleven sections

❖ **Constituents of Emerging Concern:**

  ◆ We don't know enough to regulate these therefore ongoing science should guide decisions

❖ **Incentives:**

  ◆ The planning work will cost money and State Board will help with finding funding

So where are we.....

CECs

- Expert Panel has been assembled

- Four of the five panelists are veterans of WRF work

- First formal workshop is scheduled for the end of the month

Salt & Nutrient Plans

- Planning complete in one of the nine major regions and several sub-regions

- Planning has begun in two additional regions

- We are struggling with SWRCB staff on what a "locally-driven" effort means

Predictions for the future....

- ❖ Leadership in the water industry remains essential
- ❖ Focusing on science and collaboration not laws and rhetoric will be necessary
- ❖ Regional planning efforts may be the only way to achieve both sensible regulation and a secure water supply