



San Diego County Water Authority

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May 12, 2016

Delivered by e-mail to: commentletters@waterboards.ca.gov

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OTHER REPRESENTATIVE

County of San Diego

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

**Subject: Comment Letter – General Order for Recycled Water Use order
WQ 2014-0090-DWQ**

Dear Chair Marcus and Members of the Board:

The San Diego County Water Authority, the water wholesaler for the San Diego region, appreciates the opportunity to comment on the draft General Order for recycled water use the State Water Board is considering adopting on June 7th. We understand that this Proposed General Order will replace the existing *General Waste Discharge Requirements for Recycled Water Use* (order WQ 2014-0090-DWQ) adopted by State Water Resources Control Board (State Water Board) on June 3, 2014.

We understand comments are limited only to Finding 34, Purpose and Applicability, Page 15. It is our understanding that agencies in the San Diego region that are currently covered under Master Reclamation Permits will be allowed to continue to operate their recycled water projects under these existing permits. Use of existing permits will minimize staff labor costs for both agency and Regional Board staff which will eliminate the need to have two permits and potentially require preparation of new engineering and operations and maintenance reports associated with enrollment under the Proposed General Order.

Use of Master Reclamation Permits has increased the beneficial use of recycled water, and provided regulatory certainty to those agencies that commit limited resources for the production and distribution of recycled water to reduce imported water demands, particularly during drought conditions.

Any future update to this permit should also consider including the treatment requirements for recycled water facilities, so that more agencies will be able to benefit from this permit.

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

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We appreciate staff's collaboration with the recycled water agencies on the development of the permit. Thank you for your consideration of our region's concern regarding this Finding.

Sincerely,

A handwritten signature in blue ink, appearing to read "Toby Roy".

Toby Roy
Water Resources Manager