



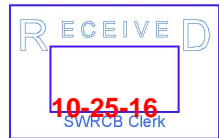
THE CITY OF SAN DIEGO

October 25, 2016

Public Comments
Report to the Legislature on DPR
Deadline: 10/25/16 12:00 noon

Sent via Electronic Mail: jeanine.townsend@waterboards.ca.gov

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



Subject: Comment letter - Report to the Legislature on Direct Potable Reuse

Dear Chair Marcus and Members of the Board:

The City of San Diego (San Diego) is moving forward with development of a large-scale potable reuse project, called Pure Water San Diego (Pure Water). Phase I of the project will deliver 30 million gallons-per-day of advanced treated recycled water to Miramar Reservoir, providing new drought-proof water supplies for San Diego. Pure Water will support the California Water Action Plan's goals to encourage regional self-reliance, bring additional focus on projects with multiple benefits, and increase the use of recycled water. We are excited to be working closely with staff of the State Water Resources Control Board's (State Water Board) Division of Drinking Water (DDW) on the Title 22 Engineering Report for Phase I, which we expect to submit to DDW for review and approval in early 2017.

In 2011, San Diego constructed a one million gallon-per-day Advance Water Purification Demonstration Facility to assist with the design and regulatory permitting of the projects that make up Pure Water. After a year of testing, with over 28,000 laboratory tests, the water produced at the Demonstration Facility was shown to be of exceptional water quality. Thereafter, San Diego's Demonstration Facility has been used for research on treatment technologies for potable reuse, contributing significantly to the body of scientific knowledge and practical experience. Additionally, San Diego has pioneered the study of surface water reservoirs for potable reuse, including hydrodynamic and water quality modeling. The viability of San Diego's Pure Water projects is supported by this extensive body of work. Phase I of Pure Water is expected to be the first indirect potable reuse with surface water augmentation (IPR/SWA) project permitted in California.

Along the way San Diego has happily shared its knowledge with the State Water Board and its Expert Panel on Potable Reuse. We are grateful for the opportunity to serve as a member of the Advisory Group on Direct Potable Reuse (DPR). We trust that the technical insights that we have been able to provide have been beneficial.

It is in the context of our involvement in developing IPR/SWA regulations and the studies of the feasibility of DPR that San Diego is pleased to present the following comments on the State Water Board's draft Report to the Legislature on the Investigation of the Feasibility of Developing Uniform Criteria for Direct Potable Reuse (DPR Report).



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Overall

The State Water Board's DPR Report, and the supporting reports by the Expert Panel and the Advisory Group, are exemplary. San Diego supports the DPR Report's overall conclusion that it is feasible to develop uniform criteria for DPR in California.

Definition of DPR

We are concerned, however, by a portion of the DPR Report in which the proposed definition of DPR refers to the Surface Water Augmentation regulations – a document that has not yet been finalized or even released for public review. We understand that the two reports were intended to be released simultaneously, and thus the conjoined nature of the definition. The delay of the proposed SWA Regulations makes it difficult to assess the following definition of DPR:

A project delivering advanced purified water to a surface water reservoir, with the reservoir providing some benefits, *but not meeting the requirements of the Surface Water Augmentation (SWA) regulations*; (DPR Report, p. 18, italics added)

We request that the State Water Board share a draft of the SWA regulations prior to finalizing the DPR Report, and remain open to additional public comment specific to the definitions of DPR. Alternatively, the DPR Report could be amended to embrace the definition that already exists in statute, which states that SWA is the planned placement of recycled water into a surface water reservoir used as a source of domestic water supply.

Allow Case-by-Case Approval of Projects

The body of scientific knowledge and practical experience needed to ensure potable reuse projects are fully protective of public health can best be achieved by the incremental advancement of a few pioneer projects along the IPR/DPR continuum. These pioneer projects should be carried out by agencies demonstrating strong technical, managerial, and financial capacities. Orange County's IPR project with groundwater recharge was pioneering in its day and was allowed under a case-by-case permitting process. The advancement of scientific knowledge was truly significant as a result of this allowance. San Diego supports case-by-case approval of IPR and DPR projects while uniform regulatory criteria are developed.

In conclusion, San Diego is supportive of the DPR Report and the direction in which IPR/SWA and DPR regulations are progressing. We are pleased to contribute to the body of scientific knowledge and practical experience supporting the advancement of potable reuse in California.

Sincerely,



Halla Razak, P.E.

Director, Public Utilities Department

JP/CP/slh