

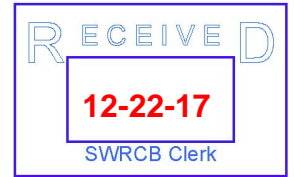


CITY OF OCEANSIDE

WATER UTILITIES DEPARTMENT

December 22, 2017

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



Subject: **COMMENT LETTER- PROPOSED RECYCLED WATER POLICY AMENDMENT EARLY PUBLIC CONSULTATION**

Dear Ms. Townsend:

This letter is in response to the notice of public comment titled "Proposed Recycled Water Policy Amendment Early Public Consultation" which included goals for recycled water use and guidance for streamlined permitting of projects that use recycled water for irrigation and groundwater recharge.

In regard to current water use efficiency legislation, recycled water is an efficient use of water and should not be prohibitive in nature. The City of Oceanside (City), together with neighboring San Diego County regional water agencies, have made significant investments to transition from using potable water to recycled water for those areas where recycled water can be an appropriate source of supply. This investment would allow will allow the City to become more sustainable and reduce our reliance on imported water. Not only should past investments be acknowledged, along with future and current ones, but agencies should be recognized for utilizing recycled water and reducing the demand to our limited resources for potable supply.

The City has a number of concerns with the extensive Constituents of Emerging Concern (CEC) monitoring proposed in this amendment. There is no information provided on the availability of commercial laboratories capable of analyzing these samples; these samples are not a requirement by any other agency. The cost of such frequent and intensive monitoring could be cost prohibitive above the existing operating and laboratory budgets projected by the City and are limited by water rates.

The City's ELAP certified laboratory is not licensed or equipped to analyze these samples, and shipping and handling these samples to specialized laboratories can be cost prohibitive very quickly. If the hold times are short (24-48 hours), expedited overnight shipping costs to deliver to specialized laboratories located far away can be astronomical, and difficult to deliver on time for shipping companies, which would void the sample. It should be taken into consideration the number of private laboratories analyzing these samples and where they are located. It is critical for the SWRCB to evaluate the financial impact of an increase in monitoring of this magnitude and the feasibility of complying with these numerous additional requirements.

Additionally, compliance and enforcement should be very clearly presented to recycled water providers well in advance for public comment and input. Will these limits be performance goals, effluent limitations or subject to mandatory minimum penalties? Monitoring for CECs prior to having a clearly written compliance policy seems premature and it is unclear why monitoring is being required prior to having these critical components put into place. There should be language explaining what the SWRCB will be doing with the data gathered from the intensive CEC monitoring required and what the path would be towards effluent limitations and compliance with these benchmarks.

The City appreciates the consideration of the SWRCB of the comments contained in this letter. If you have any questions, please do not hesitate to contact me at (760) 435-5912 or by email at lrigby@ci.oceanside.ca.us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lori Rigby". The signature is fluid and cursive, with a large loop at the beginning and a long, sweeping tail.

Lori Rigby
Compliance Officer