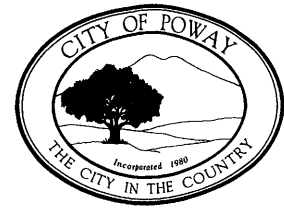


CITY OF POWAY

STEVE VAUS, Mayor
JOHN MULLIN, Deputy Mayor
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DAVE GROSCHE, Councilmember
BARRY LEONARD, Councilmember



December 21, 2017

Jeanine Townsend
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:

The City of Poway appreciates this opportunity to provide comments on the Recycled Water Policy Amendment during the early public consultation phase. Overall, the City of Poway supports amending the Recycled Water Policy to reflect the changing regulatory aspects of recycled water production and use. Below are topics that the City would like to provide additional comments on.

Topic 2: Goals and Mandates

The City of Poway strongly supports the removal of recycled water use mandates, storm water use goals, and conservation goals from the Recycled Water Policy. These topics are already covered under other statewide programs and their removal clarifies the goals of the Recycled Water Policy.

Topic 3: Tracking Use of Recycled Water

The tracking of recycled water production and use should be done in coordination with the Annual Drinking Water Report that each community water system is required to publish. Reports should be filed separately for agencies that produce and distribute recycled water. Combining the reporting requirements with the Annual Drinking Water Report would reduce the reporting burden on small recycled water users and producers. Additionally, the City supports the collection of data on a monthly schedule, however, it should be reported on an annual basis. A significant challenge is presented with monthly, or even quarterly reporting, since most agencies read meters on a bi-monthly schedule. Bi-monthly meter readings present significant statistical anomalies when reporting on a monthly basis, however, these anomalies can be minimized when reported annually. Annual reporting of monthly data is most representative of recycled water use with systems that read on a bi-monthly system.

Topic 5: SNMP Development: Prioritize Basins and Periodic Updates

Updates to Salt and Nutrient Management Plans (SNMPs) should be based on groundwater basin complexity and size. It is both costly and burdensome for agencies with uncomplicated and small alluvial groundwater basins to update SNMPs based on a periodic schedule, when there has been little or no change in groundwater basin characterization or use. It is suggested that SNMP updates be required at the Regional Water Board level as part of Master Recycled Water Permit updates to ensure the update is warranted based on changes to the basin characterization.

Topic 7: Clarify Process for Salt and Nutrient Management Plans That Do Not Result in a Basin Plan Amendment

The City of Poway strongly supports the inclusion of clarifying language in the Recycled Water Policy for SNMPs that does not result in a Basin Plan amendment. This will provide agencies that develop SNMPs much more clarity when developing the plans, and provide the Regional Water Boards with more guidance on SNMP acceptance.

Thank you for this opportunity to comment.

Sincerely,



Tina White
City Manager