



April 7, 2016

Mike McKibben
State Water Resources Control Board
Division of Drinking Water
Michael.McKibben@waterboards.ca.gov

Subject: Surface Water Augmentation – Alternative Clause

Dear Mr. McKibben:

The Bay Area Clean Water Agencies (BACWA) and WaterReuse Association, Northern California Chapter (Chapter), appreciate the opportunity to provide comments on the proposed Surface Water Augmentation Reservoir Mixing Criteria (SWA Mixing Criteria).

BACWA is a joint powers authority, comprised of public utilities providing sanitary sewer services to 6.5 million people in the nine county Bay Area. BACWA is dedicated to working with our member agencies and the state and federal governments, as well as non-governmental organizations, to deliver the best information about the water quality and enhancement of the San Francisco Bay (see <http://bacwa.org/members/> for a list of BACWA agencies). The Chapter represents agencies and firms in the Greater San Francisco Bay Area involved in the recycled water industry. BACWA and the Chapter both provide a regional forum to share recycled water information and expertise to support and advance water recycling in the Greater Bay Area. BACWA and the Chapter encourage the State Water Resources Control Board (SWRCB) to consider all comments that promote and facilitate the implementation of recycled water projects while protecting public health and the environment.

In November 2015, BACWA and the Chapter surveyed their members to determine the volumes and flow rates from reservoirs that potentially would be subject to the SWA Mixing Criteria. The Bay Area agencies that responded operate 25 reservoirs. Although some of the reservoirs may be able to meet the theoretical 6-month retention time under conditions of full volume and minimum outflow, it is unlikely that the 6-month retention time can be met under normal operating conditions for many of these reservoirs. These include reservoirs operated by Contra Costa Water District, East Bay Municipal Utility District, San Francisco Public Utilities Commission, Santa Clara Valley Water District, City of Benicia, Marin Municipal Water District, and Sonoma County Water Agency.

A number of agencies in the Bay Area are studying indirect potable reuse (IPR) options through SWA. Requiring a reservoir hydraulic retention time of at least six months would eliminate the potential to be permitted as an IPR/SWA project. Our membership has identified an important need for the State Water Resources Control Board, Division of Drinking Water (SWRCB-DDW), to allow surface water reservoirs not meeting a standard hydraulic retention time to utilize an Alternative Clause to implement their Surface Water Augmentation projects, similar to the alternatives clause in the groundwater recharge regulations in Health & Safety Code Section 60320.130. BACWA and the Chapter encourage the SWRCB-DDW to include language

identifying this proposed alternative clause pathway in the next draft of the SWA Mixing Criteria regulations.

Should you have any questions about these comments, please feel free to contact David Williams at dwilliams@bacwa.org or Curtis Lam at clam@hydroscience.com.

Sincerely,

BACWA

**WaterReuse Association,
Northern California Chapter**



David R. Williams
Executive Director

Curtis Lam
President