



March 3, 2017

Jelena Hartman
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

VIA EMAIL: commentletters@waterboards.ca.gov

Subject: Comment Letter – Climate Change Resolution

Dear Ms. Hartman,

The Bay Area Clean Water Agencies (BACWA) appreciates the opportunity to comment on the proposed Resolution on Climate Change. BACWA is a joint powers agency whose members own and operate publicly-owned treatment works (POTWs) and sanitary sewer systems that collectively provide sanitary services to over 7.1 million people in the nine-county San Francisco Bay Area. BACWA. Members are public agencies, governed by elected officials and managed by professionals who protect the environment and public health. BACWA's comments pertain to Section 1.C addressing Recycled Water, which states:

DWQ shall coordinate with the Regional Water Boards to make annual reporting of recycled water data a requirement of waste discharge permits and water reclamation requirements, and work with the Division of Information Technology to develop an online data entry system to track recycled water use. Starting with the 2017-18 annual Performance Report, DWQ shall include a summary on the volume of recycled water used, and types of use.

BACWA supports a well-planned effort to collect data on recycled water use. In fact, as part of the studies required by our Nutrient Watershed Permit¹, we have conducted a survey of our members' recycled water production to better understand the impact of recycled water on nutrient load reductions to the San Francisco Bay. As part of this effort, we found that it was important to make our data request consistent with data that agencies were developing for other reporting requirements to reduce the burden of generating additional data for different efforts.

¹ R2-2014-0014s

BACWA has the following recommendations for implementing a statewide recycled water data collection mechanism that does not create unnecessary data gathering and reporting requirements for agencies.

- 1. Reporting efforts should not be duplicated.** Regional permittees under R2-1996-0011 currently report recycled water production volume and types of use to the San Francisco Bay Regional Water Quality Control Board. By June 2019, these permittees are required to transfer coverage to the State General Order for Recycled Water, WQ 2016-0068-DDW. Once the DWQ data form is completed, the State General Order should be reopened to ensure that its reporting requirements are consistent with those developed by DWQ.
- 2. Agencies with individual recycled water permits should have only one set of reporting requirements.** For agencies not covered by either a regional permit or the State General Order, there should be a permitting mechanism developed to harmonize reporting requirements in their individual permits with the information that will be required by DWQ. They should not be required to submit separate reports to different entities.
- 3. Reporting requirements should be consistent with other data requests.** When developing their data form, DWQ should consider existing data that is generated for other state reporting requirements. For example, agencies already report recycled water data as part of their Urban Water Management Plans by calendar year. As such, it would be simplest for agencies to report recycled water by calendar year, rather than by permit year or water year.
- 4. Involve stakeholders in the development of the data forms.** To best implement the above recommendations, DWQ should work with a stakeholder group to ensure that the data entry forms make sense for users, and ask for data in a form that is readily available to recycled water producers. BACWA would be interested in participating in such a workgroup.

Please do not hesitate to contact Leah Walker, vice-Chair of BACWA's Recycled Water Committee, at lwalker@ci.petaluma.ca.us, if you would like to discuss these comments further.

Respectfully Submitted,

David R. Williams

David R. Williams
Executive Director
Bay Area Clean Water Agencies

cc: BACWA Board

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Rhodora Biagtan, BACWA Recycled Water Committee Co-Chair

Leah Walker, BACWA Recycled Water Committee Co-Chair