



September 12, 2017

Ms. Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100, Sacramento, CA 95812-2000  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**Subject: Comments – Proposed SWA Regulations**

Dear Ms. Townsend:

The Bay Area Clean Water Agencies (BACWA) appreciates the opportunity to provide comments on the proposed regulatory action Surface Water Augmentation Reservoir Mixing Criteria (SWA Mixing Criteria). 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 (SF Bay) Area. BACWA members are public agencies, governed by elected officials and managed by professionals who protect the environment and public health. BACWA provides a regional forum to share recycled water information and expertise to support and advance water recycling in the Greater Bay Area. BACWA encourages 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.

A number of agencies in the Bay Area are studying indirect potable reuse (IPR) options through SWA. Having rigid requirements without alternatives may reduce or eliminate the potential for Bay Area projects to be permitted as an IPR/SWA project. BACWA recommends as follows:

- Section 64668.30(b)(2). BACWA recommends that this section allow for less than 60 days of theoretical retention time based upon demonstration that the response retention time (RRT) and treatment value of the 60 day storage period is met by other means approved by the State Water Board.
- Section 64668.30(c)(2). BACWA recommends that this section allow for more than 10% advanced treatment process effluent that does not meet the 60 day theoretical retention time requirement, based upon demonstration that sufficient treatment has been provided to account for chemical and microbiological pollutants. The evidence for sufficient treatment would be approved by the State Water Board.

Thank you for the opportunity to comment. Should you have any questions about these comments, we would be happy to discuss this matter further.

Sincerely,

*David R. Williams*

David R. Williams  
Executive Director

Cc: BACWA Executive Board  
Rhodora Biagtan, Recycled Water Committee Chair  
Leah Walker, Recycled Water Committee Vice-Chair