

In Mr. Scoles' letter about the proposed Amendment to the Basin Plan which is addressed to the Regional Water Quality Control Board, some background information is provided. Let us consider the following: The Legislature has declared that the people of the State have a "primary interest" in the development of recycled water facilities, and that the State should "take all possible steps" to encourage the development of such facilities in order to meet the State's water needs. (Water Code 13510, 13512).

When discussion occurs about low-threat discharges and incidental runoff, there should not be the expedient actions taken to ignore the development of recycled water facilities. The SCWA should be actively involved with the recycled water facilities separate from wastewater facilities. Part of an integrated water management system for the future will involve separate facilities to handle wastewater and graywater. Graywater recycling and recycling of low threat discharges require different management. Now is the time to start the process of developing these facilities so that environmental contamination from herbicides, pesticides and fertilizers in particular can be mitigated. No short cuts should be taken. Thoughtful legislative support can be given by Assemblymember Jared Huffman who already has already introduced some legislation concerning recycling of graywater.

The problem with only reviewing plans of other Regional Boards in California as cited in Mr. Scoles's letter is the risk for very short-sighted action. Other regions of the country have integrated water management practices which can be adopted. The other California Regional Boards don't have all the answers to management of low volume "low threat discharges" or "incidental runoff". The question of "potential discharges" vs actual discharges because the water does not reach surface waters is contrary to logic when toxics contamination is involved. There should not be the rush to recycle water to the detriment of the environment and public health.

The proposed Amendment to the Basin Plan should be to encourage the development of recycled water facilities and not to circumvent Guidelines of the State Water Resources Control Board. Please understand that more options need consideration to address the complex issues of low-threat discharges and incidental runoff.