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WATEREUSE
ASSOCIATION OF CALIFORNIA

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Peter MacLaggan

Administrative/Finance Director
Karen Roberts

Member Programs Director
Kathy Snelson

June 29, 1998

Mr. Lester A. Snow, Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

JUL 07 1998

Attention: Mr. Rick Breitenbach

Draft Programmatic EIS/EIR for CALFED Bay-Delta Program

Dear Lester:

This letter presents the formal comments of the WateReuse Association of California (WateReuse) on the draft Programmatic Environmental Impact Statement/Environmental Impact Report for the CALFED Bay-Delta Program. WateReuse is a 250-member organization of municipalities, water and wastewater utilities, regulatory agencies and water resources professionals dedicated to increasing the use of recycled water in California. The Association promotes water recycling through research, education and advocacy programs aimed at increasing public acceptance and expanding the allowable uses of recycled water. Many of our member agencies are affected stakeholders within the CALFED Bay-Delta planning process and may submit individual comments on the draft PEIS/EIR. WateReuse's comments, which focus primarily on the water use efficiency element of the draft PEIS/EIR, reflect the collective needs and experience of our membership and are not intended to conflict with, or endorse, the independent views of our members.

CALFED is conducting a programmatic environmental review of a comprehensive water management strategy for the Sacramento-San Joaquin Bay-Delta Estuary that includes an extensive Water Use Efficiency Program. The Water Use Efficiency Program outlines a strategy for reducing the demand for water supplies from the Delta through an increase in water conservation and water recycling. We are encouraged by the high value CALFED has placed on water use efficiency measures within the proposed Bay-Delta solution and concur that water use efficiency measures belong as common program elements.

Water Recycling has long been an important part of local water use efficiency programs. California stands at the forefront of the water recycling movement in the United States. This year alone, over 0.5 million acre-feet (MAF) of recycled water will be beneficially reused. There are over 200 water recycling systems currently operating in the state today. Current uses of recycled water include irrigation of wide variety of crops and ornamental landscapes, wildlife and fisheries enhancement, industrial supply, groundwater recharge and many more innovative and creative applications. An expanded water recycling effort could offer a cost-effective means

RECYCLING WATER TO MEET CALIFORNIA'S NEEDS
915 L Street, Suite 1000, Sacramento, California 95814-3701 ▪ (916) 442-2746 ▪ FAX (916) 442-0382
Homepage: www.watereuse.org/h2o

of achieving water supply augmentation, reliability, water quality and ecosystem health objectives of the CALFED Program. Consequently, we would like to see water recycling evaluated on par with other options providing similar contributions to the Bay-Delta solution.

Water Recycling Potential/Targets

Recycled water can provide a substantial water source with a greater annual yield, far fewer environmental impacts, and a more rapid implementation schedule than many other new water supply options. If properly developed and encouraged, recycled water can provide an incremental solution to some of the more pressing problems facing the Bay-Delta system, including water supply reliability, water quality and ecosystem restoration. The extended timeline identified for water storage and conveyance facility decision making points to the need for a statewide implementation plan for water recycling to address the immediate and growing need for an expanded water supply.

In addition to the 200 water recycling systems currently operating in the state, a similar number of new projects are in various stages of planning. The Legislature adopted statewide goals for the beneficial use of recycled water in 1991. The aim is to beneficially reuse 700,000 acre-feet of water per year by the year 2000 and 1 MAF of water per year by the year 2010.[1] The Department of Water Resources surveyed local agency water recycling plans in 1996 and identified a statewide water recycling potential of 1.0 MAF by 2010 and 1.5 MAF by 2020. DWR's estimate forms the basis for CALFED's "No Action" level of water recycling occurring in 2020. CALFED is projecting that the current level of recycling (0.5 MAFY) will increase to 1.4 MAFY 2020 under the "No Action" alternative and 1.4 to 2.1 MAF will be available under the "With Project" alternative. Thus, CALFED has identified the potential for 0.9 to 1.6 MAF of new recycled water supply. Much of this supply could be brought on line before the first CALFED storage reservoir is dedicated.

However, past experience has shown that planning projections for recycled water development provide a rather poor indicator of actual yield. This is because from the local agency perspective, water recycling projects are complex, capital intensive undertakings. Considerable support will be needed from CALFED and from the CALFED agencies to achieve the water recycling potential identified in the draft PEIS/EIR. Without specific actions to facilitate removal of existing constraints to water recycling, the development of an additional 0.9 to 1.6 MAF of recycled water is not likely to occur. It is essential that local, regional, state and federal agencies all share in the responsibility of addressing financial, institutional, public acceptance and regulatory constraints. The No Action Alternative does not address these constraints. Consequently, the projected recycled water yield under the No Action Alternative may be overstated by as much as 25% to 50%. If, however, CALFED and the CALFED agencies provide the level of support outlined herein, then the full potential for water recycling identified

[1] Water Recycling Act of 1991, Cal. Water Code § 13577.

in the PEIS/EIR could be realized. CALFED should adopt recycling targets that match the level of support provided.

Recommendations on Water Recycling Potential/Targets: First, CALFED should lower the projected level of water recycling to be achieved under the No Action Alternative. Second, CALFED should adopt water recycling targets as common elements of the With Project Alternative consistent with the level of support CALFED and the CALFED agencies are able to commit to this effort. Third, CALFED should allocate responsibility for development of the targeted yield among the local, regional, state and federal water agencies. Fourth, the quantity of wastewater flows generated within the agency's service area should provide the basis for the water recycling targets among local and regional water agencies. Finally, CALFED should periodically review progress and be prepared to make adjustments in support functions and water recycling targets as necessary.

Water Recycling Benefits

The evaluation of water recycling potential contained in the draft PEIS/EIR has been artificially restricted to the coastal areas of the state. The draft PEIS/EIR analyzes water recycling solely as a water supply option and concludes that water recycling in the interior portions of the state does not yield "new" water. This approach ignores the potential for water recycling to help achieve water quality and ecosystem health objectives of the CALFED Program, which is inconsistent with the analysis used in the draft PEIS/EIR to justify water conservation in the interior parts of the state. It also over looks the potential to recover treated wastewater discharges to evaporation ponds located in the interior portions of the state.

Offstream beneficial use of recycled water that otherwise would be discharged to surface waters supplying the Sacramento-San Joaquin River System could result in multiple benefits. The reduction in wastewater discharges and associated pollutant loads, oxygen demand and elevated temperature could have a beneficial impact to drinking water quality and aquatic life. If the recycled water use replaces an existing or future demand for surface water, higher quality water would remain in the system and contribute to a net reduction of fish entrainment. If the use of recycled water also happens to avoid a discharge to an evaporation pond, there would be a net increase in available water supply as well.

Recommendations on Water Recycling Benefits: CALFED's evaluation of water recycling should be expanded to include the entire Bay-Delta service area and take into consideration the potential for water recycling to help achieve water supply augmentation, reliability, water quality and ecosystem health objectives of the CALFED Program. CALFED should provide guidance on accounting for all of these benefits.

Coordination of Water Recycling Planning and Implementation.

The State has adopted various policies aimed at ensuring that local agencies responsible for water supply and wastewater treatment and disposal are planning for the development of recycled water.[2] Unfortunately, there has been very little in the way of coordination among the State agencies responsible for the implementation of the policies. Adherence by the local agencies to the water recycling feasibility assessment process outlined in the Urban Water Recycling Feasibility Assessment Guidebook being developed by the California Urban Water Agencies and WateReuse could serve as the measure of adequate planning. It is difficult, however, for the local sponsor of a water recycling project to develop a comprehensive assessment of the statewide costs and benefits of water recycling. CALFED should to provide a thorough economic analysis of water recycling alongside other water management options so they can be evaluated on a parity basis. This approach would allow for the identification of the most cost-effective means of achieving the Program's water supply, water quality and ecosystem restoration goals.

The California Legislature has significantly improved the climate for water recycling in California.[3] However, additional steps are needed to capture the full potential for water recycling. CALFED can effectively promote the removal of traditional implementation hurdles facing water recycling projects. Conflicting federal, state and local policies regularly deter proponents of new uses of recycled water. CALFED could promote consistent, coordinated regulation of water recycling and facilitate the intergovernmental partnerships that are imperative to a successful water recycling program. CALFED could expand state and federal programs to provide technical, planning and financial assistance to local agencies and regional partnerships and explore new ways of developing assistance involving other CALFED agencies. CALFED could support basic and applied research and development that would ensure a high degree of public confidence water recycling. Finally, local project sponsors are regularly called upon to defend the need for water recycling. A large part of the success of the solid waste recycling industry is attributed to justifications for recycling stemming from state and federal authority. CALFED should provide ongoing communication with the public regarding the high value and limited risk of recycled water.

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[2] Water agencies subject to the Urban Water Management Planning Act must update their plans every five years with information on the potential for recycled water development (Cal. Water Code § 10633); the State Water Resources Control Board is authorized to require water right applicants, permittees and licensees to report on the potential to use recycled water for all or part of their needs and reduce the amount of water requested and require the adoption of a water recycling program (Cal. Code Regs., Tit. 23, § 780, § 848); wastewater agencies in a "water-short area" that discharge once-used wastewater to saline waters are required to submit a report once every five years to the Regional Water Quality Control Board on the potential for reclamation and reuse with an explanation as to why the effluent is not being reclaimed for further beneficial use ("In the Matter of the Sierra Club, San Diego Chapter," State Water Resources Control Board Order 84-7).

[3] The California Legislature has enacted a series of statutes to authorize new uses of recycled water, streamline regulations, provide funding and otherwise promote and facilitate water recycling. These statutes reflect the view that recycled water is both a necessity for the continued growth and prosperity of the state and an environmentally sound method of supplementing local water supplies.

Recommendations for Coordination of Water Recycling Planning and Implementation: The CALFED agencies should provide technical and financial planning assistance for local planning efforts, encourage coordination of water recycling planning among water and wastewater agencies, and implement procedures which ensure thorough examination of water recycling opportunities throughout the state. CALFED should estimate or qualitatively describe hydrologic, economic and environmental impacts and benefits from changes or reductions in Delta export patterns due to development of up to 2.1 MAF of recycled water for comparison of with other water management options under consideration. CALFED and the CALFED agencies should undertake a proactive role in promoting water recycling including promotion of consistent regulations, interagency partnerships, technical assistance, research and education. Finally, the most important support CALFED and the CALFED agencies could provide to improve the climate for water recycling is regular communication and public outreach regarding the importance, reliability and safety of water recycling.

Water Recycling Assurances.

CALFED is proposing to adopt policies to provide assurance of efficient use of water. Under these proposed policies, demonstration that appropriate planning is being carried out and cost-effective water use efficiency measures are being implemented will be necessary prerequisites for an agency to be eligible to:

- Receive any "new" water made available by a Bay-Delta solution;
- Participate in a water transfer requiring approval by any CALFED agency or use of facilities operated by any CALFED agency; and
- Receive water through the DWR Drought Water Bank.

WateReuse supports uniform accountability for planning and implementation of cost-effective water use efficiency measures. Since one of the objectives of the assurance policy would be to encourage actions that help meet CALFED water recycling targets, consideration should be given to establishing specific water recycling assurances. Water recycling assurances could trigger reduced cost or preferential access to CALFED benefits for local and regional water suppliers that implement water recycling projects contributing toward the Bay-Delta solution. Water recycling would be viewed as a form of in-kind contribution that water users could apply as a credit toward their share of the cost of the Bay-Delta solution or use to gain preferential access to CALFED benefits. Water users that are unable to recycle water simply would not have a water recycling credit or have restricted access to CALFED benefits. Equity would be maintained by ensuring that all water users contribute their appropriate share to the Bay-Delta solution. Structured properly, a water recycling assurance program can offer significant incentives for collaboration among regional and local agencies with a clear nexus to measurable progress toward implementation of statewide water recycling targets.

Recommendations for Water Recycling Assurances: CALFED should adopt a water recycling assurances program that would provide reduced cost or preferential access to CALFED benefits for local and regional water suppliers that implement (or provide incentives that result in implementation of) water recycling projects contributing toward the Bay-Delta solution. Such a program should allow for the trading of credits among local agencies so to ensure the most cost-effective projects are funded.

Water Recycling Financing

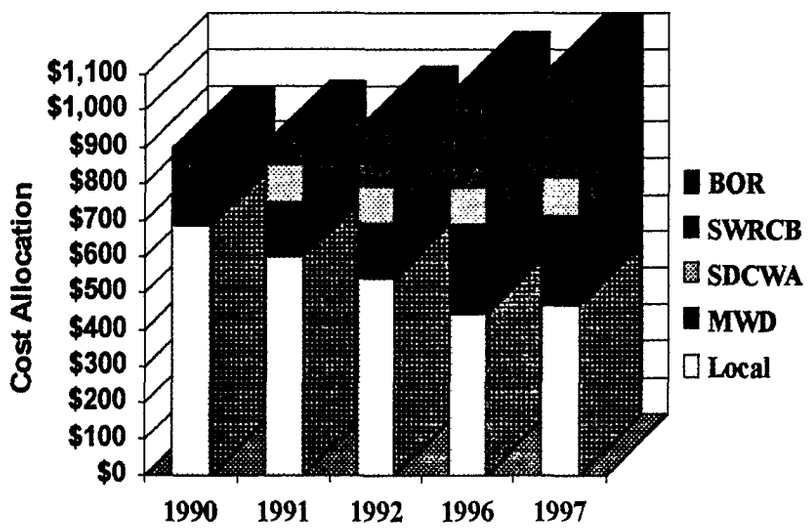
We are encouraged that CALFED agencies recognize the need to provide financial assistance to water recycling projects. Water recycling projects can be capital intensive undertakings which, when viewed from the local or regional perspective, may or may not be cost-effective. Identification of significant non-local funding sources is a necessary prerequisite to the timely implementation of the water recycling potential identified by CALFED.

Both the state and federal government have been actively involved in financing water recycling. The State Water Resources Control Board (SWRCB) administers three voter-approved water recycling bond laws that authorize the SWRCB to issue low-interest loans for design and construction of water recycling projects. With the passage of Proposition 204 in November 1996, $60 million was appropriated to the Water Recycling Loan Program. The proposed water bonds (AB 254 and SB 312) include water recycling capital financing (low-interest loans and grants up to 25% of project cost) and funding for water recycling research program; all to be administered by the SWRCB. The Bureau of Reclamation has authority to conduct feasibility studies and demonstration projects to further water recycling and participate in the design and construction of 19 water recycling projects in California that have congressional authorization to receive up to 25% in federal funding. Congress has appropriated over $100 million to water recycling projects in California since 1992. Additionally, three major water wholesalers, the Metropolitan Water District of Southern California (MWD), San Diego County Water Authority (SDCWA) and Santa Clara Valley Water District (SCVWD), have adopted financial assistance programs to help local agencies develop water recycling projects. MWD, SDCWA and SCVWD currently are spending over $10 million per year on recycling. Their investment in water recycling incentive programs is expected to grow to over $50 million per year by 2005.

Water recycling projects recently bid or constructed in the City of San Diego and City of San Jose, West Basin Municipal Water District and the San Elijo Joint Powers Authority are representative of the type of large-scale urban recycling efforts that will be needed to achieve CALFED's water recycling objectives. A large part of the success of these projects can be attributed to the significant funding provided from non-local sources. For local agencies charged making a decision as to whether to implement a water recycling project, cost-effectiveness is an important consideration. The local agency must weigh the cost of the recycled water project against other water supply and wastewater disposal options. Competing alternatives generally include the option to purchase additional water at the wholesale water rate from the imported water supplier and the option of continuing to treat the wastewater to the

minimum level required for disposal. In San Diego and San Jose, the decision to recycle water was driven primarily by wastewater disposal considerations and to a lesser extent the desire for increased water supply reliability. In West Basin MWD and San Elijo JPA, improved water supply reliability was the primary motivating factor. Reducing the local agency's unit cost of the recycled water through the availability of external funding increases the likelihood that the project will be determined to be cost-effective and the agency will decide to proceed to implementation. For example, Figure 1 illustrates that while the cost of water recycling in San Diego County has increased over the last eight years, the availability of external funding has also increased, which has allowed the unit cost to the local agencies to decline considerably.

Figure 1
Sources of Funding
San Diego County Water Recycling Projects



The unit cost of the San Diego, San Jose, West Basin and San Elijo water recycling projects range from $900 to $1,200 per acre-foot delivered, of which $650 to $900 is allocated to capital debt service and $250 to $300 goes toward operation and maintenance. The initial capital investment for these projects was on the order of $7,000 to $10,000 per acre-foot of installed capacity.[4] These agencies have secured long-term commitments for external funding to offset project costs: San Diego 48%, West Basin 42%, San Elijo 41% and San Jose 31%. Without the

[4] Average capital investment after deduction of costs associated with over sizing of facilities to accommodate future expansions is $8,500 per AFY of installed capacity.

availability of external funding, it is questionable whether these projects would have been implemented.

CALFED has identified the potential to increase water recycling statewide from a 0.5 MAF today to 1.4 to 2.1 MAF by 2020. Based on the experience in San Diego, San Jose, West Basin and San Elijo, the capital investment required to develop 0.9 to 1.6 MAF of additional recycled water yield would be in the range of $7.6 to 13.6 billion dollars. Past experience also suggests that 30% to 50% of this funding, or $2.3 to $6.8 billion, must come from non-local sources (federal, state and regional) to maintain local interest in water recycling. Stated differently, local agencies would assume the responsibility for construction and operation of the water recycling facilities and bear 50 to 70 percent of the cost. In many instances, regional agencies would assume a significant portion of the remainder of the cost.

Thus, to realize the water recycling potential in the Water Use Efficiency Technical Appendix, CALFED would need to identify $115 to $340 million per year (for 20 years) of federal, state and regional funding.[5] Putting this in context with existing non-local commitments for funding of water recycling, the low end of the range can be accomplished with a 60% increase in existing non-local funding commitments, while a 380% increase will be required to achieve the high end of the range.[6]

Recommendations for Water Recycling Financing: To realize the water recycling potential in the Water Use Efficiency Technical Appendix, CALFED should identify $115 to $340 million per year (for 20 years) of federal, state and regional funding. The funding could be provided in the form of up front capital financing, payment upon development of yield (per in-kind assurances recommendation) or partial of capital financing and partial payment for performance.

Detailed Comments

Note: underlined text denotes suggested correction.

Phase II Report

Water Supply Opportunities, page 123-125. In the Phase II report, CALFED discusses the water supply opportunities of each alternative, noting that "significant increase in water supply

[5] At 30% non-local cost sharing and and 0.9 MAFY of new recycled water: 900,000 AF x $8,500/AF x 0.3/20 years = $115 million/year; at 50% non-local cost sharing and 1.6 MAFY of new recycled water supply: 1,600,000 AF x $8,500/Af x 0.5 (50% non-local share)/20 years = $340 million/year.

[6] The Bureau of Reclamation is currently spending $34 million per year on water recycling in California. State financing of water recycling is in the form of revolving low interest loans, which reduce the water recycling project financing costs by about 23%. Since 1977, the State Water Resources Control Board has provided $225 million in loans and grants for design and construction of water recycling projects, the equivalent of approximately $4 million per year in grants. Funding incentives stemming from existing commitments of the regional agencies are expected to average $33 million per year over the next 20 years. Combined non-local funding $71 million per year.

opportunities are only provided if new storage is included under all Program alternatives." This analysis has not taken into consideration the potential to augment available supplies with recycled water. CALFED's use of the model used to project water deliveries to south of Delta SWP and CVP water users does not pick up any potential recycled water supply beneficiaries, the combined total of which could exceed the projected 750 to 900 TAF of average annual critical period supply from new storage.

Page 57, Water Use Efficiency Facts and Figures sidebar state that the Water Use Efficiency program "could exceed $0.75 billion over 20-30 years" and "may require annual investment exceeding $25 million." However, as previously mentioned, CALFED needs to identify at least $115 million and perhaps as much as $340 million per year (for 20 years) of federal, state and regional funding to realize the water recycling potential identified in the Water Use Efficiency Technical Appendix.

Water Use Efficiency Component Technical Appendix

Page 1-2, paragraph 5, first sentence should read California Water Recycling Law (Cal. Water Code Sections 13500 – 13556).

Page 1-6, Table 1.1, Bulletin 160-98 and CALFED urban conservation estimates should not be added together to arrive at total, the former is a subset of the latter.

Page 2-20, paragraph 3, the survey identified actual recycling of over 450,000 acre-feet annually in 1996, and projected recycling of 1.49 million acre-feet annually by 2020.

Page 2-2-, paragraph 4, the DWR 1996 survey reports total 1996 reuse of over 450,000 acre-feet.

Page 2-21, paragraph 5, BMP for water recycling is unnecessary and inappropriate. Each water recycling project is a unique undertaking, which is not necessarily conducive to BMP approach. UWCC not qualified to oversee implementation of water recycling BMP. The recommendations presented above offer a more effective approach to improving the climate for water recycling.

Page 2-22, Funding Assistance. Consideration needs to be given to both streamlining and restructuring of existing state funding programs to accomplish CALFED water recycling objectives. Currently, SWRCB prohibited from funding water recycling projects unless they are cost-effective from a local perspective. This approach is inconsistent with CALFED's stated intent to fund water recycling projects meeting Program objectives, which may not be cost-effective for a local entity, but would be on the basis of a statewide cost-effectiveness test. Average elapsed time from date of submittal of an application for funding under the Water Recycling Loan Program until SWRCB award of funding is over 13 months.

Page 2-23, Regional Water Recycling Opportunities, CALFED participation in regional studies would be welcomed.

Page 2-23, Assurances for Water Recycling, see Water Recycling Assurances discussion above.

Page 6-1, paragraph 1, through Title 22 of the California Code of Regulations.

Page 6-1, 6-2, New Supply vs. Total Water Recycling. To be consistent with the approach used to evaluate water conservation measures, CALFED's evaluation of water recycling should be expanded to include the entire Bay-Delta service area and take into consideration the potential for water recycling to help achieve water supply reliability, water quality and ecosystem health objectives of the CALFED Program.

Page 6-2, paragraph 3, important way of reducing the need to obtain new water supplies.

Page 6-3, Least Cost Planning. Agree with least cost planning approach to water supply development. It is difficult, however, for the local sponsor of a water recycling project to develop a comprehensive understanding of the costs and benefits of competing alternatives so they can be assessed on a parity basis. CALFED needs to provide a thorough economic analysis of competing water management options and should identify the most cost-effective means of achieving the Program's water supply, water quality and ecosystem restoration goals. CALFED should estimate or qualitatively describe hydrologic, economic and environmental impacts and benefits from changes or reductions in Delta export patterns due to development of 1.4 to 2.1 MAF of recycled water for comparison of with other water management options under consideration.

6-4, paragraph 1. Support suggestion that CALFED agencies assume a planning and financing assistance role for recycling projects.

Page 6-5, top, change reference to § 13142(e) to § 13577.

Page 6-6, 6-9, 6-10, and page 55 of Phase II report. No Action Levels. Without specific actions to facilitate removal of existing constraints to water recycling, the development of an additional 0.9 MAFY of recycled water is not likely to occur. By definition, the No Action Alternative would not address these constraints. Therefore, the projected recycled water yield under the No Action Alternative is probably overstated by 25% to 50%.

Page 6-7 paragraph 1, last line, whose demand is not seasonal,

Page 6-9, paragraph 3. The survey, with 230 respondents, identified 1996 water recycling levels at over 450,000 acre-feet per year, and projected the potential for recycling at 1.49 million acre-feet annually by 2020.

Pages 6-11 to 6-12, Establishing an Upper Limit of Water Recycling Potential. An important consideration to be factored into the discussion of water recycling potential beyond 1.4 MAF is

water quality and the cost of demineralization treatment. Many of the wastewater treatment plants in the coastal regions receive relatively poor quality influent. MWD's Phase I Salinity Management Study indicates that 19 treatment plants representing 50% of the wastewater flows generated in its service area have a total dissolved solids (TDS) content of 1,000 mg/l or higher. For example, the Point Loma WWTP in San Diego has a discharge of 2.4 mgd and an effluent TDS of 1,600 mg/l. Similarly, Carson WWTP in Los Angeles County receives a large volume of high TDS industrial waste discharges. Implementation of the water conservation measures identified in the Water Use Efficiency Program will further degrade the quality of potential sources of recycled water. SDCWA conducted a study on the impact of toilet retrofit programs on recycled water quality that concluded that retrofit of all pre-1980 toilets in the City of San Diego would result in a 4% to 5% increase the TDS in the wastewater collection system. Thus, a significant portion of the treated effluent currently being discharged to the ocean may not be suitable for recycling.

Closing Remarks

What distinguishes water recycling from other water management strategies CALFED is considering is that the local agencies are prepared to implement the projects and assume responsibility for a significant portion of the cost. Water recycling can provide an incremental solution to some of the more immediate problems facing the Bay-Delta system, including water supply reliability, water quality and ecosystem restoration. The potential exists for up to 1.0 MAFY of new recycled water supply to be on line by 2020, perhaps more. Consequently, we would like to see water recycling evaluated on par with other options providing similar contributions to the Bay-Delta solution. CALFED should conduct a thorough economic analysis of various levels of water recycling for comparison with other water management options capable of achieving the Program's water supply, water quality and ecosystem restoration objectives. WateReuse stands ready to assist with this analysis.

Implementation of the water recycling potential identified in the draft PEIS/EIR will require a shared responsibility among the local, regional, state and federal agencies. Similar to other options under consideration by CALFED, water recycling will require a number of funding, legislative, regulatory, contractual and institutional changes for the supply targets to be realized. The combination of water recycling targets, implementation strategies, assurances and financial support recommended herein represent an integrated package of policies and incentives that would be closely linked to CALFED objectives. It is recommended that CALFED:

- Adopt water recycling targets matching the level of water recycling determined to be necessary to achieve specific Program objectives;
- Adopt implementation strategies that would forge state and federal policies to achieve the targeted level of water recycling; and
- Adopt financial support programs to achieve the targeted level of water recycling.

CALFED would ensure that it is not paying more than its fair share of the water recycling programs by limiting the state and federal financial contributions to an amount less than or equal to the value of the benefits accruing to the Program.

Thank you for the opportunity to comment on the Draft PEIS/EIR. WateReuse commends CALFED's open, collaborative effort to develop a long-term plan to restore ecosystem health and improve water management for beneficial uses of the Bay-Delta system. Please don't hesitate to call if you have any questions regarding these comments (619) 523-4661.

Sincerely,

Peter MacLaggan
Executive Director

cc: Byron Buck, CUWA
Deborah Braver, Bay Area Regional Water Recycling Program
Ronnie Cohen, EWC
Steve Kasower, Southern California Comprehensive Water Recycling Study
David Kennedy, DWR
Felicia Marcus, USEPA
Rick Martin, USBR
Walt Pettit, SWRCB
Steve Ritchie, CALFED
Rick Soehren, CALFED
James Waldo, Ag/Urban Policy Group

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WATEREUSE ASSOCIATION OF CALIFORNIA
915 L STREET, SUITE 1000
SACRAMENTO, CALIFORNIA 95814-3701

Steve Ritchie
CALFED
Department of Water Resources
1416 Ninth Street, Room 1155
Sacramento, CA 95814

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