



# REGIONALSAN

TAKING THE WASTE OUT OF WATER

Sacramento Regional County Sanitation District

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California Water Commission  
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## Subject: Comments on Water Storage Investment Program Draft Regulations

Dear Ms. Marr:

The Sacramento Regional County Sanitation District (Regional San) appreciates the opportunity to comment on the Proposition 1 Water Storage Investment Program (WSIP) Draft Regulations. Regional San provides wastewater treatment for over 1.4 million residents and businesses in and around the Sacramento region treating, on average, around 150 million gallons per day of wastewater. With the future completion of Regional San's wastewater treatment plant upgrades – known as the “EchoWater Project” – all of the Plant's treated water, approximately 167,000 acre feet per year, would meet water recycling standards and could be available for additional water recycling and groundwater storage and enhancement opportunities. We are dedicated to protecting, conserving, and restoring water resources in California, and know that WSIP offers an excellent opportunity to help fund projects that will enhance the resiliency of our water system.

Our specific comments on the draft regulations are outlined below. Items highlighted in red underline, include recommended language changes. Items highlighted in yellow refer to language changes that the Water Commission has made to the proposed regulations and that we support.

### Article 1. Definitions

#### **Section 6000 Definitions**

- “Groundwater dependent ecosystem:” we appreciate that this definition includes the following highlighted language recognizing that groundwater does not have to emerge in order to be accessible to, and support, groundwater dependent habitats: “or on groundwater occurring near the ground surface.”

- “Conjunctive use project.” Regional San is supportive of recent changes to this definition, specifically that it now lists “surface water resources” instead of “surface water reservoirs.”
- “Groundwater Storage Project:” we appreciate that this definition now recognizes in-lieu recharge as a component of groundwater storage projects. However, we suggest that the definition be modified to also include “supporting groundwater dependent ecosystems” to the list of groundwater uses.

## **Article 2. General Provisions, General Selection Process, and Funding Commitments**

### **Section 6002 General Selection Process**

- Regional San requests that the Commission commit to closing the project solicitation at least one year after the final quantification regulations are adopted. Given the complexity of the requirements of this program, applicants should be given at least one year from the finalization of the quantification regulations to prepare and finalize their applications.
- We also recommend that a section be added to the draft regulations which states the following: “Documentation that the project is included in an Integrated Regional Water Management Plan (IRWMP).”

### **Section 6003. Funding Commitments (a) Conditional Funding Commitment**

- Section (a) (2) indicates that the Commission will be able to either substantially reduce the original funding commitment or pull funding from a project at any given time. Given the likely high cost of these projects, and the significant amount of time and resources required to plan and implement them, this is a particularly troublesome concept. We suggest that the draft regulations include some additional clarity about what type of circumstances would cause funding to be reduced or withdrawn.

## **Article 3. Quantification and Management of Benefits**

### **Section 6005 Priorities**

California Department of Fish and Wildlife

- (a) (1) Flow and Water Quality: We are pleased to see this important function of groundwater storage included in priority (H) as highlighted: “(H) Maintain groundwater and surface water interconnections to support instream benefits and groundwater dependent ecosystems.”
- (a) (2) Physical Processes and Habitat: We appreciate that the following highlighted language has been added to priority (A), reflecting the important impact that groundwater conditions can have on habitat quantity and quality: “Enhance flow regimes or groundwater conditions to improve the quantity and quality of riparian and floodplain habitat for aquatic and terrestrial species.”

State Water Resources Control Board

- (b) We appreciate that the word “restore” has been added to priority (6). This addition reflects the fact that groundwater restoration can be a critical element of groundwater projects.

**Section 6006 Relative Environmental Value**

California Department of Fish and Wildlife

- (a) In sub-section (8), “Location of ecosystem improvements and connectivity to areas already being protected or managed for conservation values,” we are pleased to see that enhancement of seasonal and permanent wetlands and riparian habitat are included as a priority. We are also pleased to see the added emphasis on enhancement of existing protected lands.

We would like to reiterate our appreciation for the opportunity to give our feedback on the development of the WSIP, a program that will have an important impact on our water supply system. If you have any questions regarding our comments or if we can be of any assistance, please contact me at 916-876-6092 or [mitchellt@sacsewer.com](mailto:mitchellt@sacsewer.com).

Sincerely,



Terrie L. Mitchell  
Manager, Legislative and Regulatory Affairs

cc: The Honorable Members of the California Water Commission  
Prabhakar Somavarapu, District Engineer – Regional San  
Christoph Dobson, Director of Policy & Planning – Regional San