



December 18, 2007

California Department of Water Resources  
Attention: Paul Dabbs, Chief  
Water Resources Evaluation Section  
Statewide Water Planning Branch  
PO Box 942836  
Sacramento, CA 94236-0001

Via Electronic Mail and US Mail

**RE: Proposed Revisions to the California Water Plan to Incorporate Wastewater Treatment and Infrastructure**

Dear Mr. Dabbs:

The Southern California Alliance of Publicly Owned Treatment Works – or SCAP as we are commonly referred to – represents 84 public agencies that provide both water and wastewater treatment to nearly 18 million people in parts of Los Angeles, Orange, San Diego, Santa Barbara, Riverside, San Bernardino and Ventura counties. We treat and safely reuse or dispose of over 1 billion gallons of wastewater each day and deliver over 1.7 billion gallons of drinking water per day. SCAP appreciates the opportunity to submit a recommendation for including wastewater treatment and infrastructure in the revisions to the California Water Plan.

SCAP recognizes that a key objective of the California Water Plan is to present a diverse set of resource management strategies to meet the water related resource management needs of each region and statewide. Included in the Resource Strategies in the California Water Plan Update for 2005 was a strategy: Improve Water Quality. There are five areas listed in Table 1, Strategy Summary Table, for this particular Strategy. SCAP recommends adding a sixth line item, **wastewater treatment and infrastructure**. The rationale is that wastewater treatment includes physical, biological, and chemical processes to meet the beneficial uses of waters in the state. There are multiple benefits in updating wastewater treatment systems and infrastructure. The primary benefit is pollution prevention and protection of the beneficial uses of waters in the state, which is a stated goal of the California Regional Water Boards' Basin Plans. A secondary benefit is the ability to increase water recycling projects throughout the state.

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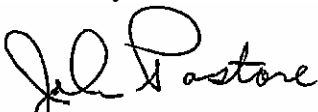
SCAP respectfully requests the following additions and be made to the California Water Plan Update:

- Addition of **wastewater treatment and infrastructure** in the Resource Strategies: **Strategies to Improve Water Quality**.
- Revise Chapter, 13 Pollution Prevention (page 13-5) as follows:
  - ✓ (1) (second sentence) “The state should adopt a strategy that integrates improvement in pollution prevention, **including improvements to wastewater treatment and its associated infrastructure**, water quality matching, and or drinking water treatment and distribution.”
  - ✓ (5) “The state should prioritize grant funding for source water protection activities **including wastewater treatment and its associated infrastructure and** building institutional capacity for watershed planning.”

Investments in wastewater infrastructure will help to improve water quality by protecting beneficial uses of waters of the state, maintain pollution control, increase water reuse and help in reducing Green House Gas (GHG) emission.

Should you have any questions, you may reach me at 949-489-7676.

Sincerely,



John Pastore  
Executive Director

cc: Darrin Polhemus, State Water Resources Control Board  
Tam Doduc, Chair of State Water Resources Control Board  
Frances Spivy-Weber, State Water Resources Control Board  
Lewis Moeller, Department of Water Resources  
Kamyar Guivetchi, Department of Water Resources