



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION IX**

**75 Hawthorne Street**

**San Francisco, CA 94105-3901**

November 4, 2019

Members of the City Council  
City of Palo Alto  
250 Hamilton Avenue  
Palo Alto, CA 94301

Dear Councilmembers,

In September 2019, the U.S. Environmental Protection Agency (USEPA) released for public comment a draft National Water Reuse Action Plan (<https://www.epa.gov/waterreuse/water-reuse-action-plan#draft>). The Plan identifies priority actions and the leadership needed at all levels of government and with all sectors to advance water recycling and make wiser use of scarce water resources. Water reuse is one of the nation's most promising opportunities to support communities and the economy by bolstering safe and reliable water supplies.

For several years, USEPA Region 9 has participated in discussions among Bay Area water managers about the need for improved regional integration of wastewater, stormwater, and drinking water management. USEPA Region 9 is pleased to support the proposed water reuse agreement between Palo Alto, Mountain View, and the Santa Clara Valley Water District to advance water reuse programs within Santa Clara County. We are aware that the negotiations to draft this agreement have taken years and recognize your efforts to meaningfully advance water reuse in the county. We appreciate your leadership and believe the agreement represents an important step towards expanding water reuse and moving towards a widespread regional water reuse system.

Expanded water reuse in the county via the proposed partnership agreement could yield environmental benefits by keeping a significant amount of treated wastewater from being discharged to San Francisco Bay. The Lower South San Francisco Bay is relatively shallow and historically saline with limited freshwater inputs. With increased urbanization, freshwater inputs to Lower South San Francisco Bay have created freshwater marsh conditions at the backs of marshes and reduced habitat for endangered species such as the Ridgway's Rail and Salt Marsh Harvest Mouse. Projects that come out of the proposed partnership are expected to decrease these freshwater inputs and restore the more historical salinity regime while providing a more sustainable and reliable water supply for Santa Clara County. We fully support this partnership and urge the Council to approve the agreement. Please contact me if I can be of further assistance at [smith.davidw@epa.gov](mailto:smith.davidw@epa.gov) or (415) 972-3464.

Sincerely

A handwritten signature in blue ink that reads "David Smith".

David Smith  
Assistant Director  
Water Division (WTR-3)

Cc: Karin North, Palo Alto Regional Water Quality Control Plant

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## San Francisco Bay Regional Water Quality Control Board

November 5, 2019

City Council  
City of Palo Alto  
250 Hamilton Avenue  
Palo Alto, CA 94301

**Subject: Partnership to Advance Water Reuse in Santa Clara County**

Dear Councilmembers:

The San Francisco Bay Regional Water Quality Control Board (Water Board) is pleased to support the proposed Partnership between Palo Alto, Mountain View, and the Santa Clara Valley Water District to advance water reuse programs within Santa Clara County. The Water Board strives to preserve, enhance, and restore the quality of the Region's water resources for the protection of the environment, public health, and all beneficial uses as well as to ensure proper water resource allocation and efficient use, for the benefit of present and future generations. Consequently, the Water Board strongly supports projects that increase the beneficial reuse of highly treated wastewater. The use of recycled water is an important component of a secure and reliable and resilient water supply. This project is an important step towards expanding water reuse and moving towards a regional water reuse system.

Expanded water reuse in the county via the proposed Partnership should yield multiple water quality and other environmental benefits. These include smart beneficial reuse of highly treated wastewater rather than discharging it to Lower South San Francisco Bay. This may help avoid further loss of surrounding salt marsh habitat, which supports endangered species such as the Ridgeway Rail and Salt Marsh Harvest Mouse. It would also help reduce further loading of nutrients and other pollutants to the Bay, while reducing reliance on external sources of drinking water. These are obvious win-wins in your and our interests in sustainable and reliable water supply and protection of San Francisco Bay.

In closing, the Water Board appreciates the opportunity to support water reuse opportunities, and we will work collaboratively with your and other Partnership staff on the development and permitting of Partnership projects.

Sincerely,

Thomas Mumley  
Assistant Executive Officer

cc: Karin North, Watershed Protection Manager, Environmental Services, City of Palo