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**Cc:**  
**Subject:** Recycled Water Committee Meeting Wednesday, July 31, 2024 Comment  
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**To: Recycled Water Committee**

**Topic: Recycled Water Committee Wednesday, July 31, 2024 Meeting**

**Subject: Comments 1 & 2**

1. **The 2035 wastewater recycling to potable win the water goal be increased to the current maximum potential available (i.e., 44,000 AF/Y) for the Pure Water Projects.**

**The acceptance/rejection of Director Beall's outreach goal change by the Recycled Water Committee appears to remain unresolved.**

Comment 1 Background:

Director Beall expressed in the Tuesday, July 09 2024 Valley Water Board Meeting that the wastewater to potable target by 2035 be increased from 22,000 AF/Y to 44,000 AF/Y, the maximum convertible amount, as an outreach objective. This higher goal should be embodied in the 2050 Water Master Supply Plan; otherwise, the opportunity to fully exploited this most cost-effective alternative to importing drought susceptible Delta water to increase water supply would be delayed years (e.g., 30). Master Plan project goals should be outreach and reduced when technical or financial performance reasons dictate.

2. **Request that the expert report(s) on the Palo Alto Potable Reuse Project containing scope, analysis, references and cost estimates be published for public review.**

**It is fiscally irresponsible by Valley Water to not understand the reasons for the significant adverse discrepancy between the Palo Alto Reuse Project and benchmark Orange County wastewater recycling facility. The difference goes way beyond 'Economies of Scale' as an explanation.**

Comment 2 Background:

A longstanding request (i.e., 6/18/24) exists to have the Palo Alto Potable Reuse Project expert report(s) identifying scope, capital cost and operating cost be made public but the request remains open.

Table 1 below compares Palo Alto Reuse Project to 'Best-In-Class' Orange County Wastewater Groundwater Replacement Facility in 2023 economics.

<b>Table 1</b>	<b>Capacity</b>	<b>Capital Investment</b> without Interest	<b>Operational Cost</b>
<b>Palo Alto</b> Potable Reuse Project	8,000 AF/Y	\$780M	\$1,650/AF
<b>Orange County</b> Wastewater Groundwater Replacement	145,000 AF/Y	\$700M	\$750/AF

It is believed that the capital cost of the Palo Alto project doubled because of a need for a 20-mile pipe line to export the water to ponds rather than employ direct potable water insertion – why? The automatic osmosis process employed between the Palo Alto and Orange County facilities is almost identical yet Palo Alto operational Cost is 2.2X higher – why? Either the benchmark performance levels derived from Orange County's wastewater recycling facility website are incorrect or the Palo Alto Reuse Project is a terrible investment by Valley Water and pursuit of this project should be reassessed.

**Best regards,**

*Jim*

**Jim Kuhl**, Civic Issue Activist and Environmental Advocate