

This is a copy of the comment from Andrew Austreg

Jocelyn Jones, believing this was a duplicative comment, erroneously deleted it from the eComments system. Upon discovery that it was not duplicative and was submitted through the comment box in eComments and not as an attachment, has copied the content of the comment from the exported word version of the comments by topic (file name: 102617 Export DRAFT Response to comments.docx) and is being resubmitted to eComments as an attachment.

Comment on Purple Book Guidance:

The Purple Book should be modified to clarify that the recoverable quantity will be based on analysis of water budget impacts. The draft language in Section 12.3 of the Purple Book currently states "Recovery of reclaimed water stored in an aquifer (aquifer recovery) is exactly that, recovery of the reclaimed water that has been stored in an aquifer". As written, this statement is ambiguous and could apply to either a recharged volume of water, or on a chemical fingerprint of recharged water. If the Department adopts the position that chemical fingerprinting (e.g., "breakthrough curves") will determine recoverable quantities, few ASR projects will ever come to fruition using reclaimed water.