



March 25, 2019

The Honorable Robert Hertzberg and Scott Wiener
California State Senate, Rooms 4038 and 4066
Sacramento, CA 95814

RE: SB 332 (Hertzberg/Wiener) – Oppose Unless Amended
(As Introduced, February 19, 2019)

Dear Senators Hertzberg and Wiener:

On behalf of Water Reuse California (WRCA) we must respectfully oppose your bill, SB 332, unless it is significantly amended to create a framework for achieving attainable goals for promoting water recycling in California, and reducing ocean and bay wastewater discharges.

The mission statement of WRCA is to promote and maximize the beneficial uses of recycling water throughout California. We believe that wastewater discharged to the ocean/bays should be maximized for water recycling when it is economically feasible and regulations and other factors are in place so that the recycled water can be used for beneficial purposes. Unfortunately, SB 332 includes mandates that are unattainable at this time for a number of reasons. In our view the **most** significant issues with SB 332 include:

- A lack of state and federal funding to achieve the mandates in the bill. The Clean Water SRF currently has an \$8 billion waiting list. WRCA has been advocating that the Water Board sell additional bonds to expand this critical loan program.
- The potable reuse regulations in the state are not complete. WRCA sponsored legislation in 2017 (AB 574 Quirk) that requires the development of raw water augmentation regulations by 2023. Unfortunately, the Governor's Budget contains no funding to the State Water Resources Control Board to support this regulatory development.
- The SB 332 mandate of attaining 95% reduction of wastewater discharge by 2040 lacks recognition of brine discharges and storm events.
- Requiring agencies to reduce their wastewater discharging by a percentage of their average discharges between 2010 and 2020 severely disadvantages agencies that have aggressively implemented conservation and water recycling.

Our Board of Trustees met on March 17 and decided to form a Board-level working group to develop a set of amendments for your consideration. We will be in touch with you in the coming weeks and look forward to working with you.

Sincerely,

A handwritten signature in black ink that reads "Jennifer West". The signature is written in a cursive, flowing style.

Jennifer West
Managing Director

cc: Members, Senate Environmental Quality Committee