



April 16, 2019

The Honorable Hannah-Beth Jackson
Chair, Senate Judiciary Committee
California State Senate, Room 2187
Sacramento, CA 95814

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

Dear Senator Jackson:

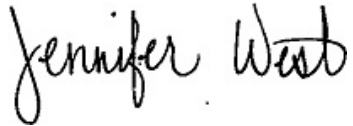
On behalf of Water Reuse California (WRCA) we are opposed to SB 332, unless it is significantly amended to create a framework for achieving attainable goals for promoting water recycling in California, and reducing ocean and bay wastewater discharges.

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 322 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) 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.

We recently met with the Senator Hertzberg's staff and the sponsors of the bill to encourage an approach that would address the above issues and strengthen local planning between water and wastewater agencies that discharge wastewater to bays and oceans. We believe locals are in the best position to develop feasibility analyses to be sure the reduction targets are realistic, economical and achievable. We look forward to continued discussions with the author and sponsors.

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: Senator Andreas Borgeas, Vice Chair, Senate Judiciary Committee
Members, Senate Judiciary Committee
Amanda Mattson, Consultant, Senate Judiciary Committee
Scott Seekatz, Republican Consultant, Senate Judiciary Committee
Senator Robert Hertzberg
Senator Scott Wiener