

State Water Resources Control Board
Second Edition Direct Potable Reuse Framework
November 5, 2019

Good morning. I am Jennifer West, Managing Director of WaterReuse California. On behalf of WRCA, we strongly **appreciate** and **support** the second edition framework as it sets California on a path to maximize potable reuse supplies in a manner that is both bold and protective of public health. As you know, potable reuse provides communities a sustainable, locally controlled source of water, which will help meet the needs of our state's growing population. As such, we believe potable reuse -- and raw water augmentation and treated drinking water augmentation specifically -- should be major part of the strategy for making the state's water supply climate resilient and also included in the Governor's Water Resilience Portfolio.

The proposed actions in this framework will turn DPR from a far off theoretical water supply -- into a real option for California communities. The framework approach is to combine into **one** Expert Panel the development of regulations for Raw Water Augmentation AND Treated Drinking Water Augmentation. We strongly support this approach, and

again, agree with staff that both sets of DPR regulations can be developed with the advise of an Expert Panel in a manner that protects public health. We also applaud the timeline in the framework, which estimates that the regulations can be completed by 2023 – the statutory deadline in AB 574. We think this is an important deadline and why we are supportive of the Water Board starting immediately to assemble this Expert Panel.

In our comment letter we list of number of questions and concerns with some portions of the framework. These include:

- Clarification that Waste Discharge Requirement will not be necessary to regulate DPR projects if there is no discharge to waters of the state.
- A minor clarification that drinking water treatment plants treat a variety of source water supplies – not just surface water supplies;
- And while DPR is not expected to create degradation of water quality in any way, the Policy should not contain a statement that NO degradation is allowed as that is not in compliance with the existing Anti-degradation Policy. This policy allows degradation under a variety of circumstances.

In conclusion, this is truly a groundbreaking document. For the first time in this country it lays the foundations for statewide regulations for Raw Water Augmentation and Treated Drinking Water Augmentation – otherwise known as DPR. WaterReuse California thanks the staff for this effort and we plan to continue to work with the Board as we move into the Expert Panel phase of the regulation development. Thank you!