



February 6, 2020

Jared Blumenfeld
Secretary for California Environmental Protection Agency 1001 I Street
P.O. Box 2815
Sacramento, CA 95812

Wade Crowfoot
Secretary for Natural Resources 1416 Ninth Street, Suite 1311 Sacramento, CA 95814

Karen Ross
Secretary for California Department of Food and Agriculture 1220 N Street
Sacramento CA 95814

Dear Secretaries Blumenfeld, Crowfoot, and Ross:

On behalf of WaterReuse California (WRCA), we thank you for the opportunity to provide comments on Governor Gavin Newsom's 2020 draft Water Resilience Portfolio (Portfolio). In general, we strongly support the approach of the Portfolio which recognizes the importance of recycled water as a drought resistant source of supply and recommends a number of critical actions to further the development of recycled water throughout California.

To assist in making these important recommendations more actionable, WRCA offers the following suggestions and comments:

Increase Clean Water State Revolving Fund (CWSRF) Financial Capacity

WRCA particularly appreciates recommendation 4.1, which calls for increasing the financial capacity of the CWSRF to support recycling, reuse, and wastewater projects. The CWSRF is a very successful low-interest loan program that has helped finance water recycling projects statewide. But the state needs to add funding capacity to this critical program. Currently there is a \$3 billion backlog of water recycling projects on the CWSRF waiting list and a recent WRCA survey showed \$10 billion in project financing needs over the next 10 to 15 years. To make the 4.1 recommendation more actionable, WRCA suggests the Portfolio increase state issued revenue bonds so the current program can be expanded by approximately \$300 million a year over the next 10 to 15 years.

Complete Potable Reuse Regulation by 2023

WRCA applauds recommendation 4.2, which states the Water Board complete raw water augmentation and treated drinking water augmentation regulations by 2023. To complete recommendation 4.2 two actions are necessary and we recommend these interim steps be listed in the Portfolio. These include 1) complete all of the research identified in the Direct Potable

Reuse Criteria Feasibility Report to the Legislature currently underway; and 2) in 2020 the Water Board should convene an expert panel as required by AB 574 (Quirk 2017) to help develop these regulations.

Complete Onsite Reuse Regulations

WRCA strongly supports recommendation 4.3 that calls for the development of regulations for risk-based water quality standards for onsite collection and non-potable reuse of water in residential, commercial, and mixed-use buildings. WRCA recommends the Water Board provide semi-annual updates on its progress to meet the 2023 statutory deadline created by SB 966 (Wiener 2018).

Update Non-Potable Recycled Water Regulations

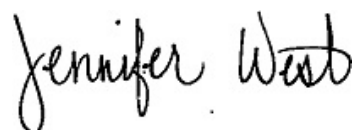
WRCA supports recommendation 4.4 which states the Water Board update the 20-year-old non-potable recycled water regulations and eliminate outdated and overly prescriptive requirements. AB 1180 (Friedman 2019) requires this update occur by 2023 if funding can be allocated for the update. WRCA recommends the Water Board begin this update in 2020, increase funding to ensure timely completion and update the stakeholders semi-annually on its progress.

Increase Source Control Over Hard to Eliminate Chemicals

Within the water quality section of the Portfolio, WRCA recommends enhancement of all source control recommendations. Public wastewater treatment plants and water recycling agencies are passive recipients of harmful chemicals contained in an array of consumer products that are washed down indoor drains or flushed down toilets from industries and residential communities. Strong source control and other upstream actions to stop the flow of these chemicals at their source are important to support water recycling agencies and expand reuse throughout the state. WRCA recommends the Portfolio state that the Department of Toxic Substances Control, Department of Pesticide Regulation and other state agencies exercise full regulatory authority to phase out or discontinue the use of harmful chemicals, such as PFAS, which cannot be easily eliminated through conventional wastewater treatment.

In summary, WRCA is very pleased with the Portfolio's strong support of water recycling. We look forward to working with all the state agencies on implementing these recommendations. Should you have any questions regarding WRCA comments, please do not hesitate to contact me at jwest@watereuse.org. Thank you again for this opportunity, and we look forward to working with your agencies in developing a resilient water future for all Californians.

Sincerely,

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

Jennifer West
Managing Director