



November 4, 2021

Ginachi Amah  
Recycled Water Unit Chief  
Division of Drinking Water

Dear Ms. Amah:

WaterReuse California (WRCA) looks forward to working with you in your new role as Unit Chief of the Recycled Water section. In the near term, we would like to discuss possible ways to streamline the Engineering Report (ER) requirements for recycled water projects. Specifically, we are seeking simplified ER requirements for smaller, or non-complex agricultural reuse projects.

We believe the timing is right for DDW to simplify the ER for these types of projects. As you know, when "recycled water" is used for agricultural purposes, but is not in compliance with Title 22, including the required ER, it is not considered "recycled water" for purposes of the Water Board's Annual Volumetric Reporting. From previous Department of Water Resources recycled water surveys, we believe there may be numerous sites in the Central Valley that fall into this category. We also believe agencies may be willing to go through the steps to comply with Title 22 if the ER were simplified. This would ensure that the Water Board's annual volumetric reporting reflects the full agriculture reuse in the state – which is an important policy goal of the Water Board.

Last month I spoke to Randy Barnard, who indicated DDW would welcome suggestions for simplification of the ER. The WRCA Agricultural Committee met recently and would like to offer the following conceptual suggestions:

- **Funding:** Consider grant funding to assist in preparing ERs for DACs
- **Signage and Access Control:** Simplify signage and access control documentation requirements for remote/inaccessible areas
- **Monitoring:** For existing permits, in lieu of duplicating the monitoring requirements in the ER,, cite the permit or attach it
- **Supplemental water supply cross-connection control:** reduce requirements on mapping of the distribution system if the utility has been in operation without incident
- **Pond-based system and storage:** For simple systems with limited uses, consider waiving the requirement for secondary process redundancy.
- **Training:** Provide simple guidance that clearly defines minimum requirements.

- **Groundwater Wells:** Allow users to identify known wells within a shorter radius of the facility (e.g. within 200 feet).
- **Develop Simplified ER Template and FAQ**
  - Establish a threshold for those eligible to use a template-- for example, less than a certain volume of recycled water produced/served per year
  - At a minimum this should include all reuse on land owned by one wastewater agency
  - Develop FAQ to facilitate understanding of the simplified ER and where it applies

I will be reaching out soon to schedule a meeting with you and your team to discuss these suggestions. Thank you in advance for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Charles LaSalle', written in a cursive style.

Charles LaSalle  
WaterReuse California  
Regulatory Affairs Director  
Include phone and email

cc: Water Board Vice Chair, DeeDee D'Adamo