



August 11, 2023

Submitted via email: cwpcor@water.ca.gov

Ms. Tonianne Pezzetti
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

**RE: Comment Letter – California Water Plan Update 2023
Municipal Recycled Water Resource Management Strategy Draft Memorandum**

Dear Ms. Pezzetti:

WaterReuse California (WRCA) thanks you for the opportunity to submit comments on the California Department of Water Resources' (DWR) Municipal Recycled Water Resource Management Strategy Draft Memorandum (draft RMS). WRCA represents 220 public agencies, consulting firms, and companies committed to expanding the use of recycled water in California. As we address more specifically below, because of the short comment period, we have not had adequate time to fully vet the draft RMS so will only be providing recommendations on the portions we have a consensus opinion.

Specific recommendations:

Comment Period: The draft RMS was made available to stakeholders on Friday, July 21, 2023, with a deadline for comments of August 1, 2023. Extending the original seven working day deadline was greatly appreciated. While we understand the draft RMS is not subject to the Administrative Procedure Act, we recommend that there be a second longer comment period so we can continue to vet this with our statewide membership. We think at least a 45-day comment period is necessary.

Document: We recommend that the draft RMS be posted on your website and be made readily available to the public. We have done our best to circulate the draft RMS in our newsletter and via targeted emails, but our membership has only been able to obtain a copy of the draft RMS from us as a PDF. Having the document more broadly available to the technical staff at our public agencies, for example, would greatly enhance our ability to provide robust and detailed responses.

Recommendation 1, Engineering Report: WRCA supports streamlining in the Engineering Report for small, recycled water projects and concurs with DWRs recommendation as it applies to small projects. We would support a simplified template for these small Wastewater treatment plants (WWTPs) that may have only have one or two recycled water sites, adjacent to the treatment plant, for example. It is important to permit these types of projects under Title 22, but also to recognize the need to streamline the regulatory requirements for small, potentially disadvantaged communities. The recently released version of the Engineering Report does not clearly provide a simplified process for small projects. WRCA provided the Water Board suggestions for simplifying the Engineering Report, but they were not accepted.

Recommendation 4, In-depth Agricultural Reuse Study: WRCA supports this recommendation and suggests the new study build upon the research being done by the Water Research Foundation. Please examine the [Agricultural Use of Recycled Water: Impediments and Incentives](#) study conducted by Dr. Kara Nelson and Anne Thebo. WRCA continues to be supportive of efforts to expand agricultural reuse in the Central Valley.

Recommendation 5, Assess what the potential costs are for advanced treated water for DPR. Identify GHG emissions for comparison to SWP and Colorado River conveyance and desalination: WRCA thinks this recommendation is unneeded as the Water Board Strike Team working on the implementation of the California Water Supply Strategy is already assessing costs and permit issues associated with DPR.

Vocabulary: The document should avoid word choice or statements that are contrary to public confidence in water reuse. Terms such as “waste” or “disposal” when referring to treated wastewater discharges are not consistent with messaging that recycled water is a valuable resource.

Challenges to Water Recycling in California

In 2019 WRCA did an in-depth assessment of the regulatory, research and funding challenges that needed to be addressed to expand recycled water in California – [California WaterReuse Action Plan](#). As you assess barriers to reuse in California, WRCA recommends consideration of these recommendations in the RMS.

WRCA would like to reiterate that we are available for you to obtain information about current and planned projects within California, investment needs for future projects, and education of wastewater professionals. WRCA looks forward to working with DWR and the State Board on advancing water reuse to meet local demands for water.

Declining Flows: Due to factors such as water use efficiency standards for plumbing fixtures and appliances and changes in residential water use habits, indoor water use has been in decline. The Making Conservation a California Way of Life regulations are expected to put additional downward pressure on indoor water use. Declining flows should be factored into any future water recycling goals, and the negative impacts of declining flows should be included in any discussion on challenges or barriers to expanding water recycling.

Analyses have been done on the impacts of declining flows on wastewater and recycled water systems including by California Urban Water Agencies [*Adapting to Change: Utility Systems and Declining Flows*] and the State Board [*Summary of Environmental Effects*].

Some of the observed impacts of declining flows due to conservation that we recommend including in the RMS:

- More concentrated wastewater streams with elevated concentrations of total dissolved solids, nitrogen species, and organics
- Increased costs to manage complications from more concentrated wastewater streams such as increased blockages and odors
- Increased costs to address accelerated degradation of infrastructure due to increased corrosivity
- Water quality changes in finished recycled water could limit where it can be used (higher Total Dissolved Solids where water might not be suitable for some uses like agriculture)

For questions, please contact me at rcortes@watereuse.org.

Sincerely,



Rosario Cortés, Manager of Regulatory Affairs
WateReuse California



Jared Voskuhl, Manager of Regulatory Affairs
CASA

cc: Karla Nemeth, Director, California Department of Water Resources
Joaquin Esquivel, Chair, State Water Resources Control Board