



May 29, 2024

Submitted via email: cwpcom@water.ca.gov

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

RE: Comment Letter
Municipal Recycled Water Resource Management Strategy, March 2024 Version

Dear Ms. Pezzetti:

Water Reuse California (WRCA) thanks you for the opportunity to submit comments on the March 2024 version of the California Department of Water Resources' (DWR) Municipal Recycled Water Resource Management Strategy (RMS). WRCA represents 200 public agencies, consulting firms, and companies committed to expanding the use of recycled water in California.

In general, we believe that the RMS represents a thorough overview of the challenges and opportunities of expanding recycled water and potable reuse in California. We thank you for recognizing in this version the significant new opportunities for expanding potable reuse in California with the recent adoption of the Direct Potable Reuse (DPR) regulations.

Below are WRCA recommendations for further refinements of the RMS.

Introduction: Include References to All Potable Reuse Regulations

While the other Indirect Potable Reuse regulations are referenced later in the RMS, we believe the adoption of all three sets of potable reuse regulations should be cited in the introduction.

Suggested language below.

This resource management strategy (RMS) was last updated in 2013. Since then, there have been significant changes in regulations regarding the use of recycled water and public acceptance of its use. In 2014 the State Water Board adopted statewide regulations for potable reuse for groundwater augmentation and in 2018 the State Water Board adopted regulations for Reservoir Water Augmentation. Most recently, in December 2023, the State Water Resources Control Board (State Water Board) adopted new regulations for direct potable

reuse (DPR) requirements that increase the importance of recycled water as a reliable water supply for future generations.

Revise Figure 1 Potable and Non-Potable Municipal Recycled Water

As non-potable recycled water is conveyed in purple pipes in California with signage indicating “Do Not Drink”, to avoid any confusion we recommend changing the color of the potable reuse supplies from purple to light blue.

Specific Recommendations

Support Additional Research Funding

WRCA believes additional research funding is needed to help facilitate and overcome challenges associated with potable reuse including, but not limited to, new treatment technologies to support DPR projects and issues associated with brine disposal.

Include Environmental Uses in Volumetric Annual Report (VAR)

WRCA supports the quantification and reporting of treated wastewater (recycled water) used for environmental purposes. While we understand some agencies are required to use treated wastewater for instream flow purposes or wetlands enhancement, or may have chosen to do so, these uses should be included in the annual numeric quantification of recycled water uses in California. The State Water Board should co-report both the Title 22 recycled water totals and the total recycled water used for environmental purposes. To do otherwise greatly undervalues the importance of recycled water in California. Our understanding is that approximately 225 million acre-feet is used for these purposes every year.

Provide Support for Small Wastewater Treatment Facilities to Recycle

WRCA supports comments on p.15 encouraging the State Water Board to provide technical assistance to smaller wastewater facilities for the preparation of an engineering report for recycled water -- particularly for agriculture reuse purposes. WRCA also encourages the State Water Board to streamline the engineering report requirements for very simple reuse projects, such as those with only one site. WRCA believes increasing recycled water use could beneficially support the agricultural community in areas where local groundwater levels may be declining and provide needed fodder crop products to support local livestock.

Support for Central Valley 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 (WRF). 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.

Support Continued Funding Position at DWR for Recycled Water

DWR is the lead state agency for water planning in California. As recycled water and potable reuse continue to grow as a source of supply, it is important that DWR have adequate staff to support its traditional activities specifically associated with recycled water.

Quantification of Potential Costs for DPR

WRCA recognizes the importance of understanding the costs and energy issues associated with potential new DPR projects. Much of this work has been done by WRF. WRCA would support WRF updating their studies since the approval of the DPR regulations by the State Water Board. We believe DWR could play a significant role in this effort.

Water Storage Investment Program

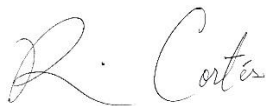
Suggested language below.

DWR will support the continued contributions of the California Water Commission in administering the Water Storage Investment Program (WSIP) to fund the public benefits associated with these projects, including benefits derived from water recycling.

Again, we thank you for preparing a thorough overview of recycled water opportunities and challenges in California. We hope you will include our comments in the next version.

For questions or to discuss any of these comments, please contact me at rcortes@watereuse.org.

Sincerely,



Rosario Cortés
Manager of Regulatory Affairs
WateReuse California



Jared Voskuhl
Director of Regulatory Affairs
California Association of Sanitation Agencies

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