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August 19, 2025

Chairman E. Joaquin Esquivel  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

**RE: Comments- Revised Proposed Regulation Text- SBDDW-22-001: Onsite Treatment and Reuse of Nonpotable Water Regulations**

Dear Chairman Esquivel:

On behalf of WateReuse California (WRCA), we are pleased to submit comments on the revised draft Onsite Treatment and Reuse of Nonpotable Water Regulation (onsite regulation). WRCA represents over 200 public agencies, consulting firms, and companies dedicated to expanding water reuse in California. We are dedicated to advancing laws, policy, funding, and public acceptance of recycled water and other types of water reuse.

**Support of Onsite Water Reuse**

We appreciate the State Water Resources Control Board's (State Board) ongoing support of recycled municipal water and potable reuse as a critical water supply for California, especially as identified in the Governor's *Water Supply Strategy*. Additionally, WRCA is committed to effective standards that promote onsite reuse where appropriate and in coordination with municipal wastewater and recycled water operations.

Our national organization, the WateReuse Association, is a partner and financial supporter of the National Blue Ribbon Commission for Onsite Water Systems (NBR Commission), which is advancing the best management practices to support the use of onsite non-potable water systems at the local level. WateReuse and the NBR Commission also recognize the importance of community choice and consultation with municipal water and sewer providers as onsite reuse is implemented and expands.

**Title 22**

WRCA continues to request that inconsistencies with Title 22 be addressed. It would be more consistent for the onsite regulations to require treatment standards similar to those for Title 22 disinfected tertiary recycled water, especially given that the onsite regulations will include

comparable levels of oversight through monitoring and reporting. Consistency with Title 22 would also help simplify public messaging. A more consistent approach to these regulations with Title 22 would make it easier to explain the difference between onsite reuse and municipal recycled water to the public.

### **SB 966 (Wiener, 2018), consultation with provider(s)**

As signed into law, SB 966 requires that local agencies that wish to establish an onsite reuse program first adopt a local program through a local ordinance. The bill further requires local jurisdictions that do not provide water or sewer services to consult with the agencies that do provide those services within their jurisdiction to ensure there are no adverse impacts to the sewer collection system, planned recycled water projects, existing community scale recycled water systems or receiving waters.

We have identified a few areas of the draft regulation that we believe need clarification to ensure the proposed regulation aligns with the intent of the consultation requirement.

We recommend this be revised to make it consistent with the 12-hour requirement:

On page 46, Section 60710:

Section 60710(a)(1) reads to notify local jurisdiction, public water system, and building tenants no later than ~~24~~ 12 hours after discovery of cross-connection.”

In our shared commitment to public health, we recommend the 12 hours as the best number of hours and request that the public water supplier be notified as soon as possible.

### **Additional Comments:**

Additionally, we have some further comments to address other key areas of the regulation. We ask that the following be corrected or clarified:

### **Operations/Certification**

We would like clarification added to the regulation about whether there will be any requirements for operator training and certification and ongoing operations. Given that several planned systems include treating wastewater or black water, and in accordance with current operator certifications required for operating all other treatment systems, there should be certification required for operators that will operate and maintain these onsite systems.

### **Treatment Requirements, Log Reduction Targets and Disinfection**

We also wanted to share that in September 2023, the NBR Commission issued a guidance document on treatment trains. It provides examples of treatment trains for onsite wastewater and graywater that could meet the draft regulations: [WWE NBRCONWS 2023-09-13.pdf](#).

## Signage

WRCA appreciates the positive changes in Section 60692. Signage.

Specifically, we appreciate that it now is required to specify that the water is “onsite treated” and that signs are now not required to be purple. However, the language in the regulations still indicates that signs should be “purple or other contrasting color” compared to the sign text. In addition to the Plumbing Code, Title 22 use area requirements (60310 (g)) also does not require recycled water signs to be purple specifically. If recycled water regulations do not mention purple signs, then the onsite reuse regulations should be consistent with that. Additionally, it would be preferable if purple stays primarily used and associated with *municipal* recycled water. We think the reference to purple should be removed from the onsite reuse regulations for consistency, since it is no longer a requirement.

WRCA recommends the following change:

On page 37, Section 60692:

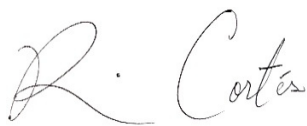
Each sign must contain letters of a highly visible color ~~on a purple~~ on a contrasting color background.

## Closing Comments

We share your commitment to public health and to diverse climate-resilient water sources and look forward to continuing to contribute positively to the State Board’s consideration of this draft onsite regulation.

WateReuse California appreciates staff’s ongoing responsiveness and the opportunity to provide these comments. For questions or additional information, please contact me at [rcortes@watereuse.org](mailto:rcortes@watereuse.org).

Sincerely,



Rosario Cortés  
Manager of Regulatory Affairs  
WateReuse California

cc: Board Members, State Water Resources Control Board  
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