



Sent via email: Commentletters@waterboards.ca.gov

August 28, 2025

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

RE: Comment Letter: 2025 Safe Drinking Water Plan

Dear Chairman Esquivel:

On behalf of WaterReuse California (WRCA), we appreciate the opportunity to submit comments on the 2025 Safe Drinking Water Plan (Plan). WRCA represents more than 200 public agencies, consulting firms, and companies committed to expanding the safe and sustainable use of recycled water in California. CASA represents more than 130 public agencies and municipalities that engage in wastewater collection, treatment, recycling, and resource recovery. Our organizations are committed to advancing policies, funding, public acceptance, and regulations that support water reuse in all forms.

Support of 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 reuse, including potable reuse as a proven process where water treated at reclamation facilities is further purified to meet California's stringent standards before being reused as a drinking water source.

Direct Potable Reuse

WRCA supports the following recommendation below and urges the State Board to allocate resources for the Division of Drinking Water (DDW) to continue this work in support of the implementation of DPR in California.

Under the conclusions and recommendations section 6.8.2, Page 173:

6-3 Support DDW's review of online monitoring methods and other field-testing methods to ensure that the methods are robust, reliable, and capable of generating data to meet regulatory requirements for PWSs and direct potable reuse projects.

Contaminants of Emerging Concern (CECs)

WRCA appreciates DDW's concerns about CECs that may occur in drinking water. However, rather than focusing solely on wastewater as a CEC source, we recommend modifying the Plan, as shown in Attachment 1, to acknowledge a range of sources of various CECs, whether from stormwater, other nonpoint source runoff (e.g. agricultural sources), or atmospheric deposition. Additionally, in the context of the use of wastewater as a source water via potable reuse as well as in permits for discharge, DDW, DWQ and Regional Boards have processes in place to assess and address CECs, and the Plan should avoid implying that CECs in wastewater are unregulated. Lastly, the draft Plan does not identify programs at other state agencies such as CalRecycle and the Department of Toxic Substances Control (DTSC) that can contribute to protection of sources of drinking water. The SWRCB should augment its efforts to collaborate with CalRecycle, DTSC and other state agencies (e.g. Department of Pesticide Regulation, Department of Food and Agriculture) to integrate their programs so as to maximize protection of California's sources of drinking water from CEC contamination.

Detailed Comments:

Additionally, we offer some further comments to address key areas of the Plan, particularly as they relate to water reuse and recycled water as a source of drinking water. Attachment 1 provides detailed recommendations regarding CECs and interagency coordination.

Closing Comments

We share your commitment to public health and to developing diverse climate-resilient water sources and we look forward to continuing to collaborate with the State Board on the development of the 2025 Safe Drinking Water Plan.

WRCA and CASA appreciate the opportunity to provide these comments. For any questions, please contact Rosario (RCortes@watereuse.org) and Jared (jvoskuhl@casaweb.org).

Sincerely,



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cc: Board Members, State Water Resources Control Board
Eric Oppenheimer, Executive Director, State Water Resources Control Board
Darrin Polhemus, Deputy Director, Division of Drinking Water
Lawrence Sanchez, Senior Water Resource Control Engineer, Division of Drinking Water