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May 18, 2018

Sent via ELECTRONIC MAIL to: DDWrecycledwater@waterboards.ca.gov

Sherly Rosilela, P.E.
Division of Drinking Water, Recycled Water Unit
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-100

Subject: Comment Letter – A Proposed Framework for Regulating Direct Potable Reuse in California

Dear Ms. Rosilela,

The California Municipal Utilities Association (CMUA), representing 43 public water agencies that serve over 70 percent of Californians, appreciates the opportunity to comment on A Proposed Framework for Regulating Direct Potable Reuse in California (Framework).

As leaders in the development of recycled water resources and supporters of AB 574 (Quirk, 2017), CMUA member agencies understand the need to develop drought-proof water supplies that will help California and local water systems achieve long-term sustainability goals in the state's changing climate. CMUA would like to commend State Water Resources Control Board staff for the timely release of Framework and hopes the final Framework emphasis a science-based approach to the regulation of direct potable reuse (DPR).

Current Language Would Increase Distrust of Tap Water

CMUA agrees that a public education component is key to customer's understanding and acceptance of recycled water projects. CMUA member agencies conduct annual surveys to better how customers view their water agencies. Overall, customers view their agencies positively, however, there is a growing distrust of tap water because of well publicized water system failures such as the one in Flint, Michigan. CMUA is concerned the language in Section 5.2.4.4 (Page 22) will lead to an increased public distrust of tap water, particularly in places where DPR projects would be feasible.

As noted in the Framework, DPR projects will be subject to stringent treatment levels and as such, it is highly improbable that household products and pharmaceuticals would end up in their

drinking water. Federal and state law (Health & Safety Code §116470) already requires public water systems to publish Consumer Confidence Reports (CCR) on an annual basis. CMUA recommends revising Section 5.2.4.4 to include language recommending water systems include in their CCRs a description of the DPR process and its benefits.

Multiple Audits/Inspections Will Increase Costs, Discourage Adoption

Section 7.1 (Page 32) calls for the potential inspection/auditing of DPR projects at every stage of a projects development. This consideration would increase costs and result in significant delays for these types projects. Currently, the Division of Drinking Water performs a review of the engineering report prior to permitting and Regional Water Boards ensure on-going compliance after the projects startup date. If additional inspection/auditing is required, CMUA recommends it take place prior to project startup.

CMUA thanks the State Water Resources Control Board for consideration of these comments and looks forward to working with SWRCB staff in developing a science-based Framework for Regulating Direct Potable Reuse in California. If you have any questions regarding the content of this letter, I can be reached at (916) 326-5806.

Sincerely,

A handwritten signature in blue ink that reads "Jonathan Young". The signature is cursive and fluid.

Jonathan Young
Regulatory Advocate
California Municipal Utilities Association

Cc: Randy Barnard, P.E., Senior Sanitary Engineer, State Water Resources Control Board