



May 12, 2016

Felicia Marcus, Chair
and Members
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100



**Subject: Comment Letter – Proposed General Order for Recycled Water Use
Revised Finding #34**

Dear Chair Marcus and Members of the Board:

Our associations appreciate the opportunity to comment on Finding 34 of the 2016 draft General Order for recycled water use (Proposed Order). As you know, we worked with your staff over the fall and into early 2016 on the Proposed Order, which will replace the existing *General Waste Discharge Requirements for Recycled Water Use* (order WQ 2014-0090-DWQ) adopted by State Water Resources Control Board (State Water Board) on June 3, 2014 (2014 Order).

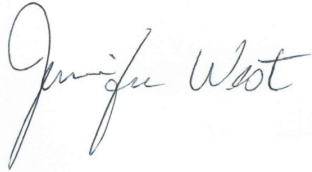
Based on these conversations, we and our membership were not expecting the new language in Finding 34, which requires that all regulatory coverage under an existing Regional Water Board general order or conditional waiver for non-potable uses of recycled water be terminated in three years and coverage be obtained under the Proposed Order. This major change will primarily impact the Bay Area recyclers and permittees in the Colorado River Basin. These agencies, which have been operating successfully under their Regional Board general order for many years, have only had a few weeks to assess the impact on their agencies of this significant change. As such, we ask that you extend the comment period on this item by one month to allow for the development of more comprehensive comments to the Board by impacted agencies.

As you know, the fundamental purpose of the Proposed Order is to facilitate the use of recycled water in the state. As such, we ask that if the Board adopts Finding 34, it work closely with the Bay Area and Colorado Basin agencies to create a smooth transition to the Proposed Order. For example, existing permittees already have effective Engineering Reports and Operational and Maintenance Plans in place. Recreating all these reports would be a significant administrative burden to agencies and should not be necessary to obtain coverage under the Proposed Order. There are also other significant differences between the Proposed Order and the Bay Area Regional Water Board general order. We ask that to the extent we are unable to work through all of the potential issues with transitioning those under Regional Orders to the Proposed Order before or at the June 7 hearing, during the three-year transition period, your staff work closely with the regional boards on these issues to make this transition as seamless as possible.


While our comments are limited to Finding 34, we have a few clarifying questions and potential issues that we intend to raise during the June 7 hearing.

Thank you again for your consideration. Should you have any questions regarding these comments, please contact Roberta Larson at blarson@casaweb.org or Jennifer West at jwest@watereuse.org.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer West".

Jennifer West
Managing Director
WateReuse California

A handwritten signature in cursive script that reads "Roberta Larson".

Roberta Larson
Executive Director
California Association of Sanitation
Agencies