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May 11, 2016

State Water Resources Control Board
commentletters@waterboards.ca.gov



Subject: Proposed General Order for Recycled Water Use

To State Water Resources Control Board:

The City of Redwood City appreciates the opportunity to provide comments on the proposed General Order for Recycled Water Use (General Order), which provides for water reclamation requirements (WRR) for recycled water use.

Redwood City provides drinking water, sanitary sewer and recycled water services to approximately 87,000 people within our service area, and has long been a proponent of water conservation and has identified recycled water as an integral component of our water supply reliability. Redwood City currently holds a permit under San Francisco Regional Water Quality Control Board (Regional Water Board) General Order 96-011.

The Regional Water Board has a well-functioning system for permitting recycled water projects, and the permitted community does not see any benefit to mandatory enrollment into the General Order. The General Order states that it wishes to streamline recycled water permitting in the State to encourage and increase recycled water use, but Finding 34 does the opposite by increasing administrative burdens and costs associated with recycled water.

If the State Water Board does adopt Finding 34 into the State General Order, Redwood City recommends that changes be made in order to mitigate the impact on permittees. We recommend that existing permittees be deemed as enrolled into the General Order to minimize administrative burden on permittees and Regional Water Board staff. Redwood City has an Engineering Report and O&M Plan that has been established and is working effectively. Resources needed to put together new Engineering Reports and O&M reports to get coverage under the new State General Order could be better used in expanding the use of recycled water.

Furthermore, imposing priority pollutant monitoring requirements in the State General Order does not make sense to implement everywhere in the State. Redwood City recommends that Regional Water Boards be given discretion to waive the priority pollutant monitoring requirements in the WRR. Redwood City encourages the State Water Resources Control Board to consider all comments that promote and facilitate the implementation of recycled water projects while protecting public health and the environment

Sincerely,

A handwritten signature in black ink, appearing to read "Ramana", written over a horizontal line.

Ramana Chinnakotla
Public Works Services Director
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