



**California League of Food Processors**

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May 3, 2016

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA, 95814



**RE: Comments Regarding the Proposed General Order for Recycled Water Use Submitted by the California League of Food Processors**

Dear Ms. Townsend:

The California League of Food Processors (CLFP) is a statewide trade association that represents food companies with operations in California. Our members include fruit, nut, vegetable, and dairy processors, some of which also have farming operations. Food processing and farming operations tend to be water intensive activities, so CLFP members have a significant interest in the Proposed General Order.

CLFP supports efforts by the State Water Board to encourage the expanded use of recycled water. This has historically been an underutilized resource due to regulatory restrictions and public misconceptions about recycled water. However, the ongoing drought and the renewed focus on effective water management necessitate a new approach to the use of recycled water.

CLFP supports the use of recycled water for agricultural crop irrigation or field dust control as long as the grower properly addresses any food safety concerns due to the potential presence of pathogens. The Food Safety Modernization Act and other regulations administered by the U.S. Food and Drug Administration (FDA) provide guidance to growers and processors regarding the quality of water that should be used in growing and processing operations. The State Water Board can defer to FDA and the California Department of Public Health regarding these matters.

Section 31 of the Proposed General Order notes that recycled water may contain elevated levels of salt, nitrogen, and other chemicals of concern. CLFP agrees that the beneficial use of recycled water for irrigation should not result in the degradation of groundwater or surface water. CLFP believes that the State Board and water supply agencies can work with the various Irrigated Lands Regulatory Program coalitions located around the state to ensure that the agronomic use of recycled water by agriculture will not conflict with other water quality initiatives. However, it is not clear how this issue will be managed regarding commercial landscape irrigation or construction dust control where there is no overarching regulatory framework.

CLFP also supports the use of recycled water for industrial uses that don't require potable water. Using recycled water, where feasible, frees up supplies of quality potable water for other more critical uses. Food processors may not be able to extensively use recycled water as many applications in food facilities require the use of potable water, but they may be able to use the water for landscape irrigation, cleaning outdoor equipment or vehicles, or other uses.

The agencies that supply recycled water must be required to provide timely and complete data to all users regarding the chemical constituents detected. The agencies should also be encouraged to establish pricing schedules that provide adequate economic incentives to use recycled water.

CLFP urges the State Water Board to work with local water supply agencies to develop the plans, infrastructure, policies, and funding to facilitate expanded capture and use of recycled water. In many cases this may require investment in conveyance, pumping, and monitoring systems. But these investments should provide great long-term dividends to the environment and to the State.

Please contact me if you have any questions regarding these comments.

Regards,

A handwritten signature in black ink, appearing to read "Rob Neenan", with a long horizontal flourish extending to the right.

Rob Neenan  
President/CEO  
rob@clfp.com