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VALLEY WATER MANAGEMENT COMPANY

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February 10, 2016

VIA U.S. MAIL

State Water Resources Control Board Members and
Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Re: **Comment Letter - General Order for Recycled Water Use**

Dear Board Members and Ms. Townsend:

We submit the following comments on behalf of Valley Water Management Company and ask that the proposed general order for recycled water use be expanded to cover more types of recycled water than just recycled municipal wastewater. As stated in Finding 7 of the draft General Order, “‘Recycled water’ means water which, as a result of treatment of waste, is suitable for direct beneficial use or a controlled use that would not otherwise occur and is therefore considered a valuable resource. (Wat. Code § 13050(n).)” Although this definition is broad, the next sentence of Finding 7 unnecessarily narrows and limits coverage under these Water Reclamation Requirements (WRRs) for recycled water use “to treated municipal wastewater for uses consistent with the Uniform Statewide Recycling Criteria, and other uses approved by the State Water Board on a case-by-case basis.”

As acknowledged in the draft General Order, “recycled water” is all water that results from the treatment of waste. However, “waste” includes not just “sewage,” but “any and all other waste substances, liquid, solid, gaseous, or radioactive, associated with human habitation, or of human or animal origin, or from any producing, manufacturing, or processing operation, including waste placed into containers of whatever nature prior to, and for the purposes of, disposal.” (Wat. Code § 13050(d).) Other forms of “waste” besides municipal wastewater can be recycled to meet water quality objectives set to protect beneficial uses and should also be allowed coverage under the WRRs being proposed, or at least under another, separate WRRs to allow for more

widespread use of recycled water that includes treated industrial stormwater or treated produced water. This would add additional sources of recycled water to further expand state water supply and reduce local water scarcity, particularly during times of drought.

For these reasons, we request that the State Water Board please consider broadening the coverage of this General Order, or adopting another streamlined WRRs that would cover a broader range of recycled water.

Thank you for your consideration of this important request.

Respectfully submitted,

A handwritten signature in cursive script that reads "Christine Zimmerman". The signature is written in black ink and is positioned above the typed name.

Christine Zimmerman
Regulatory and Legal Affairs
Valley Water Management Company