



May 9, 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 Pleasanton (Pleasanton) appreciates the opportunity to provide comments on revised Finding 34 of the proposed General Order for Recycled Water Use (General Order), which provides for water reclamation requirements (WRR) for recycled water use.

Pleasanton distributes recycled water produced by the Dublin San Ramon Services District Waste Water Treatment Plant and the City of Livermore Water Reclamation Plant, under Order 96-011 authorized by Region 2, the San Francisco Regional Water Quality Control Board (Regional Water Board). Pleasanton specifically sought approval to distribute recycled water under Order 96-011 to maintain consistency with our recycled water supplier authorized Orders. Pleasanton's authorization was granted in July of 2015.

After recently going through the process of obtaining authorization to distribute recycled water, our view is the Regional Water Board has a well-functioning system for permitting recycled water projects. Furthermore, Pleasanton does not see added benefits to a mandatory enrollment into the proposed General Order. It is our view that Finding 34 is not consistent with the intent of the proposed General Order for streamlined recycled water permitting in the State to encourage and increase recycled water use. Instead, it is our view that Finding 34 will increase our administrative burdens, costs associated with recycled water, and discourage customers from connecting to our developing recycled water system. It is our recommendation that the State Water Resources Control Board removes the language specifying the termination of existing Regional Water Board general order or conditional waiver for non-potable uses of recycled water, and subsequent transfer for coverage under the proposed General Order in Finding 34.

Pleasanton encourages the State Water Resources Control Board to consider comments that promote recycled water for beneficial use in the State and protect public health and the environment.

Should you have any questions about these comments, please feel free to contact Rita Di Candia, Water Conservation Manager, at 925-931-5513 or rdicandia@cityofpleasantonca.gov.

Sincerely,

Kathleen Yurchak
Director of Operations Services