



October 25, 2016

California Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814



Re: Comment Letter - Report to the Legislature on DPR

Golden State Water Company (Golden State Water) appreciates the opportunity to comment on the draft Report to the Legislature on the Feasibility of Developing Uniform Water Recycling Criteria for Direct Potable Reuse (Draft Report). Golden State Water is a public water utility that provides water service to approximately 255,000 service connections across California located within 75 communities throughout ten counties in Northern, Coastal and Southern California.

Golden State Water welcomes the focus of the draft report and agrees with the concepts presented.

There are two points that we would like to be considered. In regards to advancing DPR research, the report states:

*"The State Water Board will continue to work with WE&RF on its DPR Research Initiative, advising its project prioritization process and serving on Project Advisory Committees." (p. 22)*

In order to truly provide a clear and transparent understanding of potential risks associated with any proposed DPR project we recommend that the State Water Board be more inclusive in working directly with other research entities like the Water Research Foundation (WRF) and Universities in developing a research agenda that would benefit the entire state. The WRF is a member supported international, nonprofit organization that sponsors research to enable water utilities and public health agencies to provide safe and affordable water to consumers. WRF has been conducting innovative research on potable and non-potable reuse for over 40 years.

The second point relates to the research that is referenced in the report. The Water Research Foundation has supported research, both completed and on-going, that is directly relevant to the State's reuse initiative. For example, project #4508 "Assessment of Technologies for Evaluating and Demonstrating Safety of Water from Direct Potable Reuse Treatment Facilities" will evaluate the safety of existing or future DPR scenarios and help facilitate a proactive DPR monitoring process that is protective of public health. The literature review for this project was published in May 2016. It is important that SWRCB reference all scientifically sound research when communicating to the state legislature.

Sincerely,



William C. Gedney  
Vice President, Environmental Quality