

# Coalition for Clean Water

6538 Libby RD NE  
Olympia, WA 98506  
(360) 259-7593

October 12, 2017

Maia Bellon  
Director  
Washington State Department of Ecology  
300 Desmond Drive SE  
Lacey, WA 98503

DEPARTMENT OF ECOLOGY

OCT 13 2017

WATER QUALITY PROGRAM

Re: Comments on Reclaimed Water Rule

Dear Ms. Bellon,

The Coalition for Clean Water (CCW) includes 12 local government utility providers in Washington. CCW supports the Department of Ecology's (Ecology) and the Department of Health's management of reclaimed water as a critical and valuable water resource for our State. Reclaimed water has helped many CCW communities manage water in an integrated manner, providing cost-effective solutions to discharge limits and developing needed water supplies for our communities. Current and future challenges such as population growth, droughts, and changes to hydrology and water demand due to climate change will continue to drive the need for reclaimed water to play a role in the water resource management across the State. CCW strongly encourages Ecology to facilitate the regulation of reclaimed water in a way that ensures it is a valuable and available asset to our communities tomorrow and well into the future.

We appreciate the work done by Department of Ecology and Department Health over the many years the agencies have been working on the reclaimed water rule, and we are grateful that the rule-making process is anticipated to be complete within the next year. This draft rule does much a better job at recognizing that reclaimed water is a resource. We appreciate the work in streamlining reporting requirements and reducing some of the barriers and administrative costs of using reclaimed water. The draft rule encourages coordination by requiring early engagement with drinking water systems, coordination with local and state water plans and documenting concerns of potable drinking water systems as projects move from conceptual planning to design and implementation. This establishes early and continued dialogue between wastewater and drinking water systems on the role of reclaimed water



## Members:

- King County
- City of Seattle
- City of Spokane
- City of Tacoma
- Pierce County
- Spokane County
- City of Everett
- City of Lynnwood
- City of Vancouver
- Lakehaven
- LOTT
- City of Bremerton



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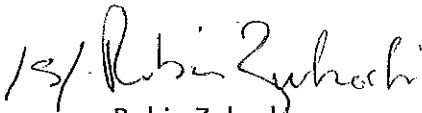
as a regional water supply. This draft reclaimed water rule is much closer to achieving the goal of eliminating barriers to use reclaimed water.

There are however a few remaining comments on the draft rule:

- **By not addressing water rights impairment issues, the state is not increasing availability of reclaimed water to much of Washington State.** While it is not likely feasible to resolve these issues as part of this rulemaking process, we request that Ecology not lose sight of reclaimed water in broader policy discussions on impairment and that efforts are made to balance out-of stream water uses and instream flow protection in water law. We need a path forward for considering tradeoffs between water quality improvement and stream flow protections.
- **Proposed chlorine disinfection standards in the draft rule are confusing.** As written, the draft rule does not specify if systems using chlorine for disinfection need to meet a free chlorine or total chlorine residual. The draft Purple Book does not provide any clarity on this issue. We request that Ecology clarify that the measurement refers to total chlorine and that the draft rule and Purple Book be updated accordingly.
- **Additional guidance may be necessary regarding control of flow.** Consider adding guidance for controlling flow to streams and other surface waters as increased flows can cause erosion of downstream channels. The NPDES Phase I Permit requires certain projects to control flows to certain downstream waterbodies. Utilizing similar guidance or referencing the Ecology stormwater guidance may be appropriate in these sections.
- **Cross-connection control responsibilities are not clear between reclaimed water generators, distributors and drinking water utilities in the draft rule.**

We appreciate the opportunity to review the draft rule and offer input at many steps along the way and hope the resulting rule will serve to facilitate the use of this important water resource for the benefit of Washington's future.

Sincerely,

  
Robin Zukoski  
Executive Director

c: Jocelyn Jones