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ORANGE COUNTY WATER DISTRICT

ORANGE COUNTY'S GROUNDWATER AUTHORITY

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April 15, 2019

The Honorable Laura Friedman
California State Assembly
State Capitol, P.O. Box 942849
Sacramento, CA 94249-0043

RE: Assembly Bill 1180 (Friedman) Water: Recycled Water - Support

Dear Assemblymember Friedman:

The Orange County Water District (OCWD; the District) writes to express its support of AB 1180 (Friedman), which would require that the State Water Resources Control Board update The California Code of Regulations, Title 22 which regulates the use of recycled water. These regulations have not been updated in 19 years.

An update to these regulations, incorporating the knowledge and lessons learned from nearly two decades of non-potable water recycling, will help the state to achieve its ambitious goals for recycled water use. AB 1180 also promotes recycled water for dual plumbed buildings and permits the use of a changeover device, or "swivel ell", so that building owners can easily switch back and forth between potable and non-potable water when required for testing or other recycled water shutdowns. The ability to easily and cost-effectively make the switch to potable water will eliminate a barrier for building owners to bring recycled water used for landscape irrigation inside their buildings.

Some examples of needed non-potable Title 22 updates include revising "outdoor eating area" restrictions to clarify that recycled water can be used in parks with picnic tables, etc. and revising dual plumbing requirements so food processing or beverage facilities (such as breweries) or buildings with cafeterias can have their restrooms dual plumbed. Another needed update would be adding additional allowable recycled water uses such as for ponds, vehicle washing, pressure testing, and approved fill stations. Updates could also clarify that the use of recycled water for homeowner's association common areas where potable water is used for irrigation of individual residences does not constitute a dual plumbed site.

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For the above reasons, OCWD is writing in support of AB 1180. As you are aware, OCWD operates the world's largest advanced potable reuse project. Your schedule permitting, we welcome you to come and tour our facility. We also hope you and your staff will look to us if you have any questions regarding water reuse issues. Please contact OCWD Legislative Affairs Liaison Alicia Dunkin at (714) 477-3750 or adunkin@ocwd.com, or me, if you have any questions and/or if we may be of any assistance to you or your staff.

Sincerely,



Vicente Sarmiento, Esq.
Board President