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ORANGE COUNTY WATER DISTRICT

ORANGE COUNTY'S GROUNDWATER AUTHORITY

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Second Vice President
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MICHAEL R. MARKUS, P.E., D.WRE

February 7, 2018

Sent via Electronic Mail: commentletters@waterboards.ca.gov

The Honorable Felicia Marcus, Chair
and Members of the State Water Resources Control Board
c/o Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

RE: Comment Letter - Prohibiting Wasteful Water Use Practices

Dear Chair Marcus:

The Orange County Water District (OCWD; the District) appreciates this opportunity to comment on the State Water Resources Control Board's (State Water Board) proposed draft regulations regarding "Conservation and the Prevention of Waste and Unreasonable Use" (Proposed Regulations). The proposal is intended, in part, to replace similar prohibitions that were part of the emergency drought response regulation which recently expired on November 25, 2017. The District respectfully requests that the State Water Board not permanently prohibit recycled water use to irrigate turf in medians and parkways in the Proposed Regulations.

OCWD developed the Groundwater Replenishment System (GWRS), the world's largest advanced water purification system for indirect potable reuse. The GWRS produces 103,000 acre-feet per year (afy) of recycled water, which is enough water for 850,000 people, is a drought-proof sustainable water supply, and offsets water imported from the State Water Project. The District is in the final stages of expanding the project up to 130,000 afy, which will be completed in 2022 and will serve 1 million people.

In addition to developing sustainable water supplies like the GWRS, Californians have continued a long-established trend in adopting water use efficiency measures that are continuing to contribute to reductions in water use. Recycled water is the ultimate form of conservation as each drop is used more than once, and should be recognized and incentivized for future project development and the expansion of existing projects.

Currently, local entities must comply with the Model Water Efficient Landscape Ordinance (MWELO) or their equally effective local landscape ordinances with regard to

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new landscapes and irrigation standards. With the MWELo in place, recycled water will not be used in a wasteful or unreasonable way and local entities will ensure recycled water and irrigation methods are properly applied, even to medians or publically-owned or maintained landscape areas between the street and sidewalks in their neighborhoods, which are currently proposed to be prohibited for watering with recycled water.

Thank you for considering our position to encourage recycled water project development and expansion, while fully utilizing current landscape ordinances to ensure recycled water is not used in a wasteful or unreasonable way. Please do not hesitate to Alicia Dunkin, Legislative Affairs Liaison with Orange County Water District at (714) 378-8232 or adunkin@ocwd.com or me if we may be of assistance to you or your staff.

Sincerely,



Michael R. Markus, P.E., D.WRE, BCEE, F.ASCE
General Manager

CC: The Honorable Steven Moore, Vice Chair, State Water Resources Control Board
The Honorable Dorene D'Adamo, Member, State Water Resources Control Board
The Honorable Tam M. Doduc, Member, Water Resources Control Board
The Honorable E. Joaquin Esquivel, Member, Water Resources Control Board
Michael Lauffer, Chief Counsel, Water Resources Control Board
Eric Oppenheimer, Chief Deputy Director, Water Resources Control Board
Max Gomberg, Climate and Conservation Program Manager, Water Resources Control Board