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ORANGE COUNTY WATER DISTRICT

ORANGE COUNTY'S GROUNDWATER AUTHORITY

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September 16, 2015

Ms. Felicia Marcus, Chair
 State Water Resources Control Board
 1001 I Street, 24th Floor
 Sacramento, CA 95814

RE: Input on State Greywater Policy Development and Priorities for Grant and Loan Funding

Dear Ms. ^{FELICIA} Marcus:

On behalf of the Orange County Water District (OCWD; the District), I want to thank the State Water Resources Control Board (State Board) for its quick response to Governor Brown's Executive Order, B-29-15. In doing so, the State Board and its staff have provided California with clear direction—water conservation must become a way of life for Californians. As the state drought emergency regulations are re-visited for the development of long-term and permanent regulations, we would like the State Board to consider local conditions and existing water reuse infrastructure investments that have already been made—to avoid inadvertently causing a net reduction in the reuse and conservation of water in Orange County.

The District is home to the Groundwater Replenishment System (GWRS), which is the world's largest advanced water purification system for potable reuse. It takes treated wastewater from the Orange County Sanitation District (that otherwise would be sent to the Pacific Ocean) and purifies it using a three-step advanced process. The GWRS currently produces 100 million gallons per day (MGD), enough drinking water for 850,000 people. Ultimate capacity for the GWRS is projected at 130 MGD after facilities are expanded further and more flows are rerouted from ocean discharge for reuse.

Governor Brown has incorporated recycled water, both potable and non-potable, into his long-term water strategy, and made his position on this matter clear. I agree that the future development of greywater systems in the state of California could aid to further water reuse. However, any state greywater policy should encourage generating new water supplies for the state. In areas such as OCWD, the vast majority of the wastewater is already being recycled back into the groundwater supply that is used by 19 cities and water districts for drinking water, so there is limited increased water supply by developing new greywater systems.

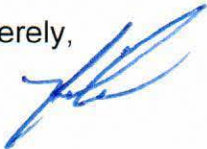
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In addition, adding an upstream greywater system would significantly impact the current flows to the GWRS, which are already down due to conservation and upstream recycling projects, and any expansion of upstream recycling would waste the capacity of our existing GWRS water recycling infrastructure. The GWRS infrastructure is a \$623 million investment, which the state contributed \$70 million of the total amount. We encourage the State Board's policy to be flexible enough to consider local conditions where there is already an investment in water recycling facilities.

I would ask that the State Board not develop a uniform state-wide policy but instead address local conditions where extensive recycling is already occurring and new greywater systems would lead to the diverting of water that could be recycled for potable reuse projects.

Thank you again for considering my comments on the development of greywater policies. I would like to request a meeting with you to discuss greywater, at your convenience. Please do not hesitate to contact me or Alicia Dunkin, Legislative Affairs Liaison with the Orange County Water District at (714) 378-8232 or adunkin@ocwd.com to schedule a meeting and/or if we can be of assistance to you or your staff.

Sincerely,



Michael R. Markus,
P.E., D.WRE, BCEE, F.ASCE
General Manager
Orange County Water District