



December 19, 2016

Diana S. Brooks  
Chief, Water Use and Efficiency Branch  
Division of Statewide Integrated Water Management  
Department of Water Resources  
901 P Street  
Sacramento, CA 95814

**Submitted via email to: [wue@water.ca.gov](mailto:wue@water.ca.gov)**

**Subject: Comments on “Making Conservation a Way of Life”, Draft Report Implementing Executive Order (EO) B-37-16**

Dear Ms. Brooks

On behalf of the Bay Area Clean Water Agencies (BACWA), we thank you for the opportunity to comment on the draft report “Making Conservation a Way of Life”, implementing Executive Order (EO) B-37-16 (draft report). BACWA’s members include 55 publicly owned wastewater treatment facilities (“POTWs”) and collection system agencies serving 7.1 million San Francisco Bay Area residents. Many of our member agencies are also recycled water producers. We host an active Recycled Water Committee where both wastewater agencies and water agencies can discuss regulatory and technical issues relating to fostering the increased use of recycled water.

BACWA has a comment specific to “Recycled Water, Section 3.1.3” of the draft report. BACWA is concerned with the requirement that landscape areas irrigated with recycled water are included in the outdoor water use targets. We appreciate that the state wants to ensure that all water, including recycled water, is used efficiently. However, there are already strict prohibitions on recycled water producers and users to prevent the release of recycled water into the environment. Including areas irrigated with recycled water into the targets effectively applies a second set of runoff prohibitions on these areas. This would be a disincentive to expanding the use of recycled water to offset potable water for irrigation. Furthermore, when urban water agencies receive credit for converting irrigated areas to recycled water, it promotes the expansion of recycled water into urban areas. This is essential to making recycled water conversions cost effective.

We urge you to exclude areas irrigated with recycled water from the outdoor water use portion of the 2025 targets. If you have any questions, please contact BACWA’s Recycled Water

BACWA Comments on Making Conservation a Way of Life

Committee chairs Leah Walker ([lwalker@ci.petaluma.ca.us](mailto:lwalker@ci.petaluma.ca.us)) or Rhodora Biagtan ([biagtan@dsrsd.com](mailto:biagtan@dsrsd.com)).

Respectfully Submitted,

*David R. Williams*

David R. Williams  
Executive Director  
Bay Area Clean Water Agencies

Cc: BACWA Board  
Leah Walker, BACWA Recycled Water Committee Chair  
Rhodora Biagtan, BACWA Recycled Water Committee Chair