



December 16, 2016

The Honorable Mark Cowin, Director
California Department of Water Resources
P.O. Box 942836, Room 1115-1
Sacramento, CA 94236-0001

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

Subject: Comments on “Making Water Conservation a California Way of Life”

Dear Director Cowin and Chair Marcus:

On behalf of California WaterReuse California (WRCA), I want to express our support for the EO Agencies and their effort to achieve the objectives outlined in Executive Order B-37-16. Further, I want to thank the State for the opportunity to provide specific input and participate in this process, which will ultimately enable California to prepare for and respond to future droughts.

WRCA is a statewide organization whose mission is to promote responsible stewardship of California’s resources by maximizing the safe, practical and beneficial use of recycled water. Over the past twenty-five years, California water suppliers have constructed water recycling facilities and conveyance projects to enable the delivery of more than 725,000 AFY of recycled water throughout California. Since the start of the prolonged drought crisis, California water suppliers have identified and planned roughly 162 new potable and non-potable recycled water projects. When completed, these new projects will deliver more than 625,000 AF of additional recycled water each year. With this in mind, WRCA strongly believes that the proposed framework should acknowledge California’s water suppliers’ efforts to pursue recycled water projects, and should incentivize future investments in new projects.

Specifically, WRCA offers the following comments and recommendations:

- **Water Shortage Contingency Plan:** WRCA recommends that the “Updated Contents of the Urban Water Management Plans” section explicitly acknowledge the benefit of developing drought resilient, hydrologically independent supplies consistent with the California Water Action Plan. Supplies such as potable reuse and recycled water should be considered fully reliable under all historical drought hydrology and plausible climate change effects. These water supplies should not be subject to reductions under shortage conditions.
- **Outdoor Irrigation Standard:** WRCA supports the use of an Evapotranspiration Adjustment Factor (EAF) of 1.0 for recycled water in the calculation of the proposed outdoor irrigation water use standard, which is consistent with MWEL0.
- **Indoor Water Use Targets:** In recognition of the efficiency benefits of potable reuse and as an incentive for the development of these important supplies, WRCA requests that the Board consider appropriate adjustments to indoor water efficiency targets to account for potable reuse.
- **Commercial, Industrial, and Institutional Performance Measures:** WRCA supports the omission of a volumetric standard and budget for CII, but recommends that the performance measures identify the use of recycled water, and any CII subsector benchmarks subsequently developed recognize the use of recycled water as being water efficient.

Again, I want to thank the State and EO Agencies for your diligence in completing this comprehensive report, and for the opportunity to comment. If WRCA can be of any assistance or you would like further information related to the use of recycled water throughout California, please do not hesitate to call me.

Sincerely,

A handwritten signature in black ink that reads "Jennifer West". The signature is written in a cursive, flowing style.

Jennifer West
Managing Director
WaterReuse California