



November 24, 2021

Karla Nemeth
Director
Department of Water Resources
1416 9th Street, Sacramento, CA

Subject : Comment Letter – Draft WUE Recommendations : High TDS Variance

WateReuse California appreciates the opportunity to provide comments on the California Department of Water Resources (DWR) draft Water Use Efficiency (WUE) implementation recommendations. We would first like to thank DWR for the work that has gone into this process. Much of the work on the high TDS recycled water variance dates to 2018 and the Model Water Efficiency Landscape Ordinance (MWELO) update. WateReuse CA is supportive of the draft recommendations for the high TDS recycled water variance. We do have two small, suggested changes.

First, we ask that the upper limit of the variance be moved from 2,000 mg/l to 1,600 mg/l and the lower limit be moved from 1,000 mg/l to 900 mg/l. While 1,000 mg/l is the upper MCL for TDS for drinking water based in the California Code of Regulations, Title 22, Division 4, Chapter 15, Article 16, the **recommended** regulatory level is 500 mg/l. Reducing the upper and lower limits of the variance is a small change that is representative of what is required to maintain plant health.

Our second request is that agencies be allowed to use the DWR landscape study at the parcel level for calculating landscape area.

We appreciate the opportunity to provide comments on DWR's Draft WUE recommendations. We look forward to working with DWR and the State Water Board throughout the process. If you have any questions regarding this letter, please contact Charles LaSalle at (916) 216-6015 or clasalle@watereuse.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles LaSalle". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Charles LaSalle
Legislative and Regulatory Affairs Manager
WateReuse CA