



Sent via email: Commentletters@waterboards.ca.gov

May 29, 2024

Chairman E. Joaquin Esquivel
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

RE: Comment Letter—Proposed Making Conservation a California Way of Life Regulation

Dear Chairman Esquivel:

On behalf of Water Reuse California (WRCA), we are pleased to submit comments on the draft Making Conservation a California Way of Life Regulation (conservation regulation). WRCA represents over 200 public agencies, consulting firms, and companies dedicated to expanding the use of recycled water in California.

After four years of working on the reuse components of the regulations, firstly with the Department of Water Resources (DWR) and now with the State Water Resources Control Board (State Board), it appears the water recycling issues have been addressed in the March 12 and May 20 drafts of the regulation. We appreciate the State Board's support of recycled water and potable reuse as a critical water supply for California. It is a key resource for diversifying local supplies and improving the State's long-term water resilience and increasing its use is a goal of the Governor's Water Supply Strategy.

We have some minor issues we would like to ask be corrected or clarified:

High Total dissolved solids (TDS) Recycled Water Variance

On Page 17, the draft reads that the Electrical Conductivity (EC) for the irrigation water is capped at 1600 milligrams per liter. EC is measured in DeciSiemens per meter. We suggest the units for the calculation be specified. We recommend clarifying whether the units for the variance calculation should be calculated in DeciSiemens/meter (dS/m) or converted to milligrams per liter for consistency.

Reporting Requirements

WRCA asks that you ensure there are no discrepancies between *annual* reporting requirements (page 31 and page 35) and proposed *fiscal year* reporting requirements for recycled water provisions. The conservation legislation allows for water suppliers' calculations to be based on *conditions for the previous calendar or fiscal year* (Water Code §10609.20, subd. (b)). Section 975 of the draft Regulation would require urban water supply reports to be based on conditions of the previous state fiscal year. We recommend that the Adopting Resolution include language that would allow staff the ability to make necessary modifications to the reporting to accommodate differences in timing of reporting in order to ensure accuracy and consistency.

Also, we request "the following" be included for clarification (page 31):

(c). For residential special landscape areas irrigated with recycled water, the supplier shall, unless otherwise specified, provide the following information to trace the recycled water network at least once every five years:

WateReuse California appreciates the recent revisions to the regulations. The new draft strikes a balance between using recycled water and potable reuse supplies efficiently and protecting and encouraging their further development in California. We thank the State Board and the Department of Water Resources for conducting years of stakeholder outreach, which has now resulted in a regulatory package that is implementable for recycled water and will help the state adapt to the climate challenges.

We share your commitment to climate-resilient water sources and look forward to partnering with the State Board on these issues to ensure cost-effective and real impacts to water conservation are realized.

Thank you for the opportunity to provide additional comments. For questions or additional information, please contact me at rcortes@watereuse.org.

Sincerely,



Rosario Cortés
Manager of Regulatory Affairs
WateReuse California

cc: Board Members, State Water Resources Control Board
Eric Oppenheimer, Executive Director, State Water Resources Control Board