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Division 3

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Division 1

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General Counsel



El Dorado Irrigation District

Alan Day – *Vice President*
Division 5

Greg Prada – *Director*
Division 2

Jim Abercrombie
General Manager



In reply refer to: EL2017-037 and M1217-017

December 21, 2017

Chair Felicia Marcus
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000

Attention: Jeanine Townsend, Clerk to the Board
Sent via e-mail: commentletters@waterboards.ca.gov

RE: Comment Letter – Prohibiting Wasteful Water Use Practices

Dear Chair Marcus:

The El Dorado Irrigation District (“EID”) appreciates the opportunity to submit comments on the State Water Resources Control Board’s (“Water Board”) draft regulations regarding “Wasteful and Unreasonable Water Uses” (“Draft Regulations”). EID is an irrigation special district that serves over 100,000 residents in El Dorado County. The services provided by EID include drinking water, recycled water, wastewater treatment, hydroelectric power generation, and recreational facilities. EID has made, and continues to make, significant investments in its infrastructure and conveyance systems to responsibly manage and deliver water supplies.

EID is committed to advancing water use efficiency and supports the Water Board’s basic goal of prohibiting wasteful water uses. EID has a variety of water efficiency programs and resources available to its customers.¹ In addition, under its own administrative regulations, EID “prohibits uses of District-supplied raw, potable, and recycled water that constitute water waste.”² Many of the water uses identified as prohibited wasteful water uses under the Draft Regulations are the same types of water uses that are prohibited as wasteful under EID’s administrative regulation.

With limited exception, EID agrees with the Draft Regulation’s list of prohibited wasteful water uses. However, EID is concerned that the Draft Regulations fail to make an important distinction between potable and non-potable water with respect to the irrigation of street medians

¹ See, for example, EID’s “Water Efficiency” webpage, available at <http://www.eid.org/customers/water-efficiency>.

² See EID Administrative Regulation 1041 “Water Waste Prohibition,” available at <http://www.eid.org/home/showdocument?id=2687>.



Chair Felicia Marcus
December 21, 2017
EL2017-037

Page | 2

and similar landscaped areas. Under EID's own administrative regulations prohibited water waste includes irrigating ornamental turf with *potable* water on public street medians. In contrast, the Draft Regulations provide, in Section 963(b)(1)(G), that the following use of water is prohibited: "The irrigation of turf on public street medians or publicly owned or maintained landscaped areas between the street and sidewalk, except where the turf serves a community or neighborhood function. . ." This proposed prohibition is not limited to the use of *potable* water. EID strongly encourages the Water Board to revise this prohibition so that it only applies to the use of potable water.

Consistent with California and Water Board policies that encourage recycled water use, EID has made significant investments in recycled water service to develop an additional water supply to meet its customers' water needs. EID's strategic goals include providing recycled water in geographic locations where feasible. For several decades, EID has expanded its recycled water service to meet water demands that would otherwise be served by potable water supplies. EID's reclamation plants produce more than 900 million gallons of recycled water each year for landscape irrigation. The recycled water is delivered to over 4,000 residential customers and almost 100 businesses in the El Dorado Hills community.

As a producer and provider of recycled water, EID wants to ensure that its customers can continue their reasonable and beneficial use of this water supply. EID considers use of recycled water for public street medians and similar landscaped areas to be a reasonable and beneficial use of a non-potable water supply. Therefore, EID asks the Water Board to revise the Draft Regulations to limit the prohibition related to irrigation of public street medians to the use of potable water for such purposes.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in blue ink that reads "Jim Abercrombie". The signature is fluid and cursive, with the first name being the most prominent.

Jim Abercrombie
General Manager
El Dorado Irrigation District

JA:EL:pj