



December 21, 2017

The Honorable Felicia Marcus, Chair
and Members of the State Water Resources Control Board
c/o Ms. Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000

Sent via email to: commentletters@waterboards.ca.gov

Subject: Comment Letter – Waste and Unreasonable Water Uses Regulations

Dear Chair Marcus and Members of the Board:

The Southern California Alliance of Publicly Owned Treatment Works (SCAP) appreciates the opportunity to provide comments on the proposed regulation prohibiting wasteful water use practices. SCAP represents 80 public agencies that provide essential potable and recycled water as well as wastewater treatment for 19 million people in Los Angeles, Orange, San Diego, Santa Barbara, Riverside, San Bernardino and Ventura counties. SCAP's member agencies provide environmentally sound, cost-effective management of more than two billion gallons of wastewater each day and in the process convert wastewater into resources such as recycled water and biogas. SCAP provides public wastewater agencies with oversight on regulatory, legislative and legal matters.

SCAP has great concerns with the prohibition of using recycled water to irrigate turf on public median strips or publically owned landscaped areas.

First and foremost, there is no link between prohibiting use of recycled water and conservation of potable water. To reduce potable water demand, we should be encouraging the use of recycled water wherever possible. Furthermore, recycled water irrigation systems are audited annually to confirm accurate and efficient use of water.

If recycled water irrigation restrictions are imposed, the following consequences may occur:

- A loss of revenue from metered recycled water connections will adversely affect the sometimes delicate financial viability of recycled water programs.

- Agencies have made investments in recycle water distribution system expansions to serve public areas. Restrictions on recycled water use will create stranded public assets and may discourage future investments in recycled water infrastructure expansions.
- Trees and shrubs planted in “turf” areas will suffer or die if irrigation is shut off and agencies cannot afford the resources to immediately re-landscape or reconfigure irrigation systems.

Additionally, to reduce urban stormwater runoff, Low Impact Development (LID) requirements have frequently driven the installation of drought tolerant grasses or “turf” in place of hardscape. Where recycled water is available, these areas are irrigated with recycled water. Prohibiting the use of recycled water in these applications would make these LID improvements suddenly become subject to expensive reconstruction or simply left without irrigation.

We strongly suggest the draft regulations be revised to allow, and even encourage, irrigation with recycled water.

If there are any questions or if additional correspondence is desired please to not hesitate to call or email me at (760) 415-4332 or sjepson@scap1.org.

Sincerely,



Steve Jepsen
Executive Director