



South Orange County Wastewater Authority



May 5, 2016

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
100 1 1 Street, 24'h Floor
Sacramento, CA 958 14

SENT VIA EMAIL

Re: Comment Letter- General Order for Recycled Water Use

Dear Ms. Townsend,

South Orange County Wastewater Authority ("SOCWA") and its member agencies have reviewed the February 22, 2016 revised General Order for Water Reclamation and have provided following comments.

SOCWA is a Joint Powers Authority consisting of ten member agencies in South Orange County including Moulton Niguel Water District, South Coast Water District, Irvine Ranch Water District, Santa Margarita Water District, Trabuco Canyon Water District, El Toro Water District, Emerald Bay Service District, City of Laguna Beach, City of San Clemente, and City of San Juan Capistrano (SOCWA's "Member Agencies").

SOCWA's Member Agencies have been producing and using recycled water for landscape irrigation for over 45 years and they collectively provide recycled water to over 7,200 Use Sites. In 2015, SOCWA agencies produced and beneficially reused 17,237 acre feet of recycled water for landscape irrigation in Region 9 area. Approximately 45 percent of local wastewater is recycled for irrigation, and this expanded production and use of recycled water has greatly reduced South Orange County's dependence on imported water.

We respectfully request that the following language be added to Finding 34 of the Proposed General Order. "*Recycled water producers covered under existing master reclamation permits or under existing individual waste discharge requirements can continue to operate under that authority until requested by the Regional Board to either expand or renew coverage under a master or individual recycled water order.*" This change will clarify the purpose and applicability of the General Order Finding. If you have any questions concerning our comments please feel free to contact Mr. Brennon Flahive, Director of Environmental Compliance at (949) 234-5419 or via email at bflahive@socwa.com.

Sincerely,

SOUTH ORANGE COUNTY WASTEWATER AUTHORITY

Betty Burnett
General Manager

BB/bf

cc: File