

Dec. 18, 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 – Prohibiting Wasteful Water Use Practices

Dear Chair Marcus and Members of the Board:

Carlsbad Municipal Water District (District) is pleased to provide the following comments on the proposed regulation prohibiting wasteful water use practices. We support long-term water use efficiency as an important part of a diverse portfolio of water management strategies to ensure a reliable water supply for California. Carlsbad has been “Making Conservation a Way of Life” since 1977, when the District first implemented its Water Conservation Program.

Comments on Article 2. Section 963 (b)(1)

Regarding the prohibitions outlined in this section, the District suggests revising the introductory language to read, “The use of *potable* water is prohibited as identified in this subdivision...”

The District began implementing its recycled water program throughout Carlsbad in 1990. Today, we have one of the most robust recycled systems in the state. Much of Carlsbad’s landscaped areas including; ornamental, slope protection, fire protection, medians, parks, parkways, trees, etc., are irrigated via the District’s recycled water system. We are in the process of completing our third recycled water expansion and at build-out, we will have nearly 1000 services. Ultimately, recycled water will account for 30+ percent of our water portfolio. The District (through its ratepayers) has made a significant investment over the last 27 years developing its recycled water system in an effort to maintain Carlsbad’s status as a lush coastal tourist destination and to give those who live, work and play in Carlsbad a continued sense of pride. The investment, which is approaching \$100 million, has reduced dependence on imported potable water, provided a reliable local source of water, and reduced wastewater discharges into the ocean.

California water agencies have made significant investments to transition from using potable water to recycled water. These investments have allowed communities to become more regionally sustainable and reduce reliance on the Bay-Delta, consistent with the Governor's Water Action Plan. These past investments must be acknowledged and the final regulation must allow agencies to continue utilizing recycled water responsibly. Additionally, many California water agencies, including Carlsbad, built their recycled water projects with assistance from SWRCB grants and loans; funding which has been voter approved. Water agencies and California residents alike have worked together to expand California's water reliability for benefit to the entire state.

Thank you for the opportunity to comment on the proposed regulation on water use prohibitions.

Sincerely,

A handwritten signature in blue ink that reads "Wendy Chambers". The signature is fluid and cursive, with the first name "Wendy" and last name "Chambers" clearly legible.

Wendy Chambers
General Manager