



Yucaipa Valley Water District

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May 3, 2015

Sent via email to Jessica.Bean@waterboards.ca.gov

Jessica Bean
California Environmental Protection Agency
State Water Resources Control Board
Post Office Box 100
Sacramento, CA 95812-0100



Subject: Comments Regarding Emergency Regulations Pursuant to Executive Order No. B-29-15

Dear Ms. Bean:

The Yucaipa Valley Water District appreciates the opportunity to provide input to the State Water Resources Control Board (SWRCB) on the implementation of the Proposed Emergency Regulations Pursuant to Governor's Executive Order No. B-29-15.

On February 3, 2009, the State Water Resources Control Board adopted Resolution No. 2009-0011 setting statewide goals and objectives for the use of recycled water. This policy recognizes that the use of recycled water reduces the dependency on groundwater supplies and imported water supplies from the State Water Project. While the State Water Resources Control Board has taken steps to support the use of recycled water with both regulations and financial assistance, there is no recognition of recycled water projects implemented prior to the 2013 baseline year. The lack of attention to long-term recycled water projects in existence prior to 2013 creates an arbitrary compliance scheme.

During this unprecedented drought, the State Water Resources Control Board should clearly identify, distinguish and support the direct use of recycled water use as part of the monthly water conservation savings calculated as a reduction in potable urban use. While the use of recycled water is reflected in the Residential-GPCD calculation it is omitted from the "Reduction in Potable Urban Use" if recycled water was used prior to the 2013 baseline period. This policy creates an inequity and a regulatory disadvantage for water purveyors that have implemented recycled water systems prior to 2013 which have generating billions of gallons of drinking water savings over the past several years as compared to the preferential treatment for a water purveyor that implements a recycled

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water system in 2014 or 2015. The water purveyor that initiates a recycled water program in 2015 has saved less drinking water, but is rewarded by data generated by the Residential-GPCD calculation and the Water Reduction in Potable Urban Use calculation.

Therefore, the Yucaipa Valley Water District recommends the following calculation be used to improve the proposed public policy formulation and support the use of recycled water throughout California:

1. Recognition of Recycled Water Use - The use of recycled water is a priority for the State of California and the State Water Resources Control Board. While the calculation of Residential-GPCD is reduced for communities that have implemented recycled water programs, the calculation for the “Water Supplier Reduction” proposed by the State Water Resources Control Board pursuant to Executive Order No. B-29-15 does not reflect the amount of drinking water conserved by recycled water programs in effect prior to the 2013 baseline period.

To recognize the use of recycled water, the State Water Resources Control Board should consider calculating the Total Water Supply Reductions as follows:

Proposed Methodology Recognizing Recycled Water Use			
Drinking Water Reduction in Potable Urban Use Compared to the same month in 2013 (%)	+	Recycled Water Reduction of Urban Irrigation Use Percentage of total monthly water demands (%)	=
			Total Water Supply Reduction (%)
Calculation Methodology			
[2015 Monthly Water Production] / [Comparable 2013 Monthly Water Production]	+	[Direct delivery of recycled water] / [2015 Monthly Drinking Water Production plus Direct delivery of recycled water]	=
			Total Water Supply Reduction (%)

The State Water Resources Control Board should adjust the calculated “Water Supplier Reduction” so communities with pre-existing recycled water systems are not unjustly penalized through this unintended disincentive.

The methodology proposed by Yucaipa Valley Water District is more useful for the State Water Resources Control Board as an indicator of communities by: (1) identifying the reduction in the amount of drinking water used compared to 2013; (2) illustrating the amount of recycled water used by a community to offset potable

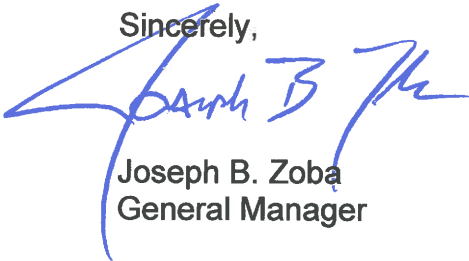
water demands; and (3) calculating the total reduction in potable urban water use for a community.

Over the past decade, our community has made significant financial investments in the development, construction and operation of a recycled water system that includes demineralization (reverse osmosis) which is necessary to meet strict water quality objectives for total dissolved solids as required by the Santa Ana Regional Water Quality Control Board and the State Water Resources Control Board.

The proposed regulatory modification described above reinforces the importance of recycled water as a component in the water conservation strategy of California in a manner that is consistent with the stated goals and objectives of the Governor, the Legislature and the State Water Resources Control Board.

Please contact me directly should you have any questions at (909) 797-5119 x2.

Sincerely,



Joseph B. Zoba
General Manager

cc: Felicia Marcus, Board Chair
State Water Resources Control Board
Post Office Box 100
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