



17140 S. Avalon Blvd.  
Suite 210  
Carson, CA 90746  
310.217.2411  
www.westbasin.org

**BOARD OF DIRECTORS**

Gloria D. Gray  
*President*

Carol W. Kwan  
*Vice President*

Harold C. Williams  
MSCE, PE., DTM  
*Treasurer*

Scott Houston  
*Secretary*

Donald L. Dear

**COMMITTED TO**

*Water Reliability*

*Water Quality*

*Sound Financial and  
Resource Management*

*Customer Service*

*Environmental  
Stewardship*

January 6, 2016

Sent via Electronic Mail: [Kathy.Frevert@waterboards.ca.gov](mailto:Kathy.Frevert@waterboards.ca.gov)

Ms. Kathy Frevert  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

RE: Input on Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation – **Drought Resilient Sources of Supply Credit**

Dear Ms. Frevert:

On behalf of West Basin Municipal Water District (West Basin), I want to thank the State Water Resources Control Board (State Board) and its staff for the quick response to Governor Brown's Executive Order, B-36-15. In doing so, the State Board has identified three potential modifications and re-enforced its clear direction—water conservation must become a way of life for Californians.

In reviewing the stakeholder proposals and the staff recommendations, West Basin was encouraged to see a modification made for Drought Resilient Sources of Supply, including desalinated seawater and, or indirect potable re-use (IPR) water. The staff recommendation does provide some recognition for urban water suppliers who have made significant investments in new drought-proof water supplies; however, the recommendation, 1) does not treat all recycled water equally, incentivizing the use of "purple-pipe"/non-potable recycled water over IPR, and 2) does not recognize efforts by California's leaders in IPR prior to 2013.

As originally adopted by the State Board, and as proposed moving forward, the State Board seeks to encourage and incentivize the maximum use of recycled water. The current guidelines account for non-potable recycled water use by excluding it from the calculation of "total water production" and providing 100% credit for any new non-potable recycled water produced and delivered.

As recommended by State Board staff, an urban water supplier who utilizes new potable recycled water would only receive a 4% reduction in their respective conservation standard. This has the effect of incentivizing the use of one recycled water treatment over another, and ignores the importance and principle of "fit for purpose" when developing recycled water programs and projects. **West Basin would recommend that IPR and non-potable recycled water be treated equally when calculating conservation.**

Ms. Frevert  
January 6, 2016  
Page 2

Secondly, the current recommendation appears to only provide the 4% reduction for those urban water suppliers that offset their potable supply with IPR of coastal wastewater since 2013. West Basin has produced advanced treated potable recycled water (IPR) since 1995, and has expanded its primary recycled water facility four times to maximize the use of recycled water, including the injection of IPR water. This IPR water is injected into the seawater barrier, to protect against salt water intrusion, and to recharge the groundwater basin. Although it takes several years for the IPR water to be extracted by local groundwater pumpers, the recommendation, as drafted, does not account for IPR water produced prior to 2013.

If the State Board chose to not treat IPR and non-potable recycled water equally, as suggested above, providing this credit to all IPR projects in operation would recognize this effort, and would have a minimal impact on California's total conservation targets. As such, **West Basin requests that the recommendation clarifies that credit for IPR would, "... apply to urban water suppliers that certify that at least 4 % of its potable supply is comprised of indirect potable reuse of coastal wastewater (the creation of which does not injure another legal user of water or the environment)."**

Thank you for considering our comments on the proposed emergency regulations. Please do not hesitate to contact West Basin if you have any questions. You can reach E.J. Caldwell, Government Affairs Program Manager with West Basin Municipal Water District at [edwardc@westbasin.org](mailto:edwardc@westbasin.org) or at (310) 660-6286 if we can be of assistance to you or your staff.

Sincerely,



Gloria D. Gray  
President  
West Basin Board of Directors

,