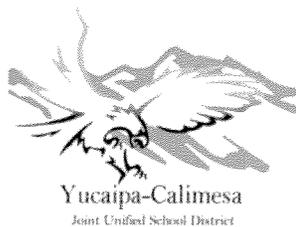


YUCAIPA-CALIMESA JOINT UNIFIED SCHOOL DISTRICT

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April 13, 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

Dear Ms. Bean:

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 statewide use of recycled water, there is no recognition of recycled water use in the Mandatory Conservation Proposed Regulatory Framework dated April 7, 2015 (attached). During this unprecedented drought, the State Water Resources Control Board should recognize recycled water as part of the monthly water conservation savings calculation by water purveyors.

Over the past decade, our community has made significant financial investments in the development, construction and operation of a recycled water system that includes desalination equipment 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.

Based on the proposed regulations, the Yucaipa Valley Water District will be required to meet a water conservation goal of 35%. However there is no credit for the amount of recycled water delivered to parks, schools and golf courses in our community since the recycled water system was placed into operation before 2013. In our school district alone we have converted to recycled water at (1) middle school and (3) elementary schools all prior to 2013. Without providing a credit, the State Water Resources Control Board is creating a disincentive for other water purveyors to construct and operate recycled water systems as a remedy against future droughts and climate change.

In the month of March 2015, the Yucaipa Valley Water District reduced the total water demand of our community by 20% with the use of recycled water. However, since the recycled water system was operational prior to 2013, this reduction is not reflected in the amount of drinking water delivered in March 2015 or March 2013.

The State Water Resources Control Board should modify the proposed regulatory framework to recognize the contribution of recycled water using the following formula:

Monthly percentage reduction in potable
urban use compared to the same month in
2013

plus

Amount of recycled water delivered as a
percentage of total monthly water demands

equals

The monthly percentage reduction of potable
water use

The proposed regulatory modification 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.

Sincerely,



David Stevenson
Director of Facilities, Planning & Operations

cc: Felicia Marcus, Board Chair
State Water Resources Control Board
Post Office Box 100
Sacramento, California 95812-0100