



CITY OF OCEANSIDE

WATER UTILITIES DEPARTMENT

February 13, 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 – Changes to Proposed Regulation Prohibiting Wasteful Water Use Practices

Dear Chair Marcus and Members of the Board:

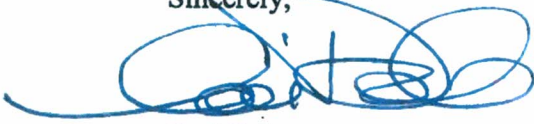
As a local urban water supplier and member agency with the San Diego County Water Authority, the City of Oceanside (the City) urges the State Water Resources Control Board (State Board) to support a long-term water policy that recognizes local investments in drought-resiliency, emphasizes ongoing water-use efficiency as an essential component of a broader range of strategies employed by the City to eliminate water waste, and leaves discretion with local water agencies to choose the appropriate management strategies to ensure long-term efficient use of a locally developed, reliable water source.

The City recognizes the efforts that have already been made by the State Board to respond to comments made by member agencies throughout the State of California. In particular, we appreciate changes made in response to requests from the City of Oceanside and other member agencies in the San Diego region. Moving forward however, we ask that the State better define water waste prohibitions that do not discourage efforts by agencies to develop a more reliable, drought-free water supply that reduces the demand on our potable water which is in critical need statewide.

In recognizing the investments being made by water agencies to produce an independent and more reliable water supply, the City asks that the State remove of any reference to prohibiting the use of recycled water. In particular, we ask that the State Board allow agencies to both continue using, as well as introduce the use of, recycled water on existing trees and shrubbery in medians and parkways. Oceanside, like many other water agencies statewide, is midway through several large scale capital projects that will significantly increase the distribution of recycled water through the installation of infrastructure, the expansion of our wastewater treatment facilities, and the implementation of new technologies such as IPR for potable reuse.

While current regulations focus on achieving the State's water reduction standards solely through conservation, it's important to recognize the benefits of investing in water supply reliability and to encourage agencies to continue to implement such strategies in addition to regulatory prohibitions intended to eliminate water waste. Rather than relying solely on a single method for meeting California's future water needs, the State's long-term strategy should allow local water agencies to continue planning for and investing in water supply reliability projects rather than discourage their efforts. Thank you again for the work you've done and continue to do throughout the state to ensure the availability of safe, reliable drinking water.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Cari Dale', with several loops and flourishes.

Cari Dale
Water Utilities Director
City of Oceanside