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VIA EMAIL: commentletters@waterboards.ca.gov

February 13, 2018

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Subject: "Comment Letter – Changes to Proposed Regulation Prohibiting Wasteful Water Use Practices"

Dear Ms. Townsend:

Camrosa Water District appreciates the opportunity to comment on the State Water Resources Control Board's (State Board) changes to the proposed regulation prohibiting certain "wasteful water uses."

Camrosa generally echoes the comments made by the Association of California Water Agencies (ACWA) in its comment letter dated February 14, 2018, but would like to expand on the recommendation to eliminate prohibitions on the use of recycled water for irrigation of turf on medians and parkways.

Camrosa has been delivering recycled water for municipal landscaping purposes for more than twenty years. On average, we deliver 5,000 acre feet a year of reclaimed water to a variety of customers for various irrigation needs. For example, California State University Channel Islands' campus is irrigated entirely with our recycled water; the City of Camarillo also uses it to irrigate medians and parkways; and a large retirement community and smaller homeowners' associations use our reclaimed water for irrigation of common areas, medians, and parkways. Section 492.14(a) of the California Code of Regulations encourages the use of recycled water, as does the State Board's Recycled Water Policy, and these recycled water customers have contributed to Camrosa's increased self-reliance and a corresponding reduction of dependence on the State Water Project. The extension of recycled water distribution systems to similar neighborhoods would further reduce the strain on the State Water Project and increase the beneficial use of recycled water, but **the prohibition in the regulation's current form disincentivizes such expansion.**

To reiterate ACWA's final point, the California Code of Regulations (Section 492.14(c)) has already designated landscapes using recycled water as "Special Landscape Areas," with a corresponding ETAF of 1.0, which is fully supportive of turf. Prescribing a blanket prohibition on turf robs local communities of the right to make the land-use decisions that are best for them.

We urge the State Board to reconsider the prohibition on irrigating turf with recycled water.

Thank you again for the opportunity to comment.

Sincerely,



Tony Stafford, General Manager

cc: The Honorable Felicia Marcus, Chair, State Water Board
The Honorable Steven Moore, Vice Chair, State Water Board
The Honorable Dorene D'Adamo, Member, State Water Board
The Honorable Tam Doduc, Member, State Water Board
The Honorable Joaquin Esquivel, Member, State Water Board
The Honorable Jacqui Irwin, Assemblymember, 44th District
The Honorable Hannah-Beth Jackson, Senator, 19th District
The Honorable Henry Stern, Senator, 27th District
Ms. Kim Craig, Deputy Cabinet Secretary, Office of Governor Edmund G. Brown Jr.
Ms. Eileen Sobeck, Executive Director, State Water Board
Mr. Eric Oppenheimer, Chief Deputy Director, State Water Board
Mr. Erik Ekdahl, Director, Office of Research, Planning and Performance, State Water Board
Mr. Max Gomberg, Climate Change Mitigation Strategist, State Water Board
Mr. Timothy H. Quinn, Executive Director, ACWA
Mr. Dave Bolland, Director of State Regulatory Relations, ACWA