



I've been in the urban water reuse and conservation industry for over 24 years, and operating in Southern California in this industry since 1996. In that time, I have seen that urban Southern California water districts across the board do a pathetic job of supporting water conservation and reuse. They all spew a lot of rhetoric about how good they are, but the facts speak volumes.

FACTS:

1. No Southern California urban water district supports greywater irrigation, the only legal form of residential water reuse in California. This is despite the fact that greywater irrigation has been a Potential Best Management Practice since 1996, that numerous studies by So Cal water agencies such as the MWD (2012), Padre Dam MWD (2004), and even the SWRCB's SRF Branch (1999) have acknowledged that greywater is a large percentage of all water used in a home, and that greywater irrigation is cost effective even when used as allowed by state law, where safety is the highest priority.

2. Essentially every urban So Cal water district that has invested rate payer and/or tax payer money into wastewater reclamation has a tremendous overabundance of "recycled" water that just goes to waste; the one exception is the Irvine Ranch Water District. Most districts waste far more than is beneficially reused. The financial loss to tax and rate payers is in the tens of millions of dollars every year. The reason tens of thousands of acre feet of "recycled" water are wasted each year is that urban water districts refuse to abide by the spirit of Water Code Section 13550 et seq, which requires recycled water to be used where practical. Instead, they all buy into even the lamest of excuses for not using that water, thus making its use virtually always "impractical".

The worst but most common excuse for wasting that "recycled" water is that builders can't be made to use "recycled" water in markets where it can't be delivered to their competitors, as that creates an unfair advantage to the builders who can't receive recycled water due to delivery infrastructure shortcomings; i.e., where purple pipe can't be cost effectively laid in the ground. The solution to that conundrum is to require that all builders of new construction either use recycled water or greywater for landscape irrigation, thus no builder has a competitive advantage, and all builders end up reusing some form of water for irrigation. Another positive consequence of this dual mandate strategy is that the water agencies with surplus recycled water end up selling more of their currently-wasted water and thus whoever paid for that reclamation plant saves money.

3. Despite all the BMPs, technologies, and other proven measures for water conservation and reuse, So Cal's urban water agencies support only very few. If they simply had a better attitude and supported almost all of those BMPs, technologies, and other proven measures, they'd have literally hundreds of thousands of acre-feet of water more per year than they presently do. But, instead they fight whoever suggests they aren't doing all they can. Case in point, the MWD, SDCWA, and CVWD spent collectively over \$200 million in attorney's fees over 12 years to fight everyone including a coalition named Protect Our Water and Environmental Rights, who documented how those urban water districts could conserve and reuse more water than is included in the largest proposed water transfer on record, from Imperial Valley and the Salton Sea to the coast. That transfer is ultimately going to require billions of dollars for mitigation of its environmental consequences, but those urban water districts evidently could care less.

4. Even where a So Cal urban water district has a Water Plan on the books, they don't enforce it. Instead, they simply let everyone be an exception. Big lawns instead of more arid-friendly plantings, sprinklers instead of drip, lawns in street medians, run-off by the tens of thousands of AF per year, all are the norm in So Cal. Even in new construction, where it costs nothing extra to get the landscaping and irrigation right the first time, they don't enforce what's on their books. The reason for their failure to comply with the spirit of SWRCB's state planning goals is that it's easier on their conservation enforcement employees. The San Diego County Water Authority is the poster child for this lackadaisical attitude. For example, in this third straight dry year where everyone else is enforcing at least something, the SDCWA still doesn't enforce their normal alleged prohibitions against water waste and misuse, and hasn't even threatened to enforce Phase One of their drought plan. You can drive around that county and see landscapes being built right now that look like landscapes that were built generations ago when California had tens of millions less people and much more water available per capita.

Don't kid yourself into thinking that the urban So Cal water agencies will enforce your new requirements just because there is a real crisis brewing; they simply don't "get it". You will need to insure their compliance.

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