May 1, 2015

State Water Resources Control Board
Attention: Ms. Jessica Bean
1001 1 Street, 24th Floor
Sacramento, CA 95814

Subject: Draft Emergency Regulations

Dear Honorable Board Members:

On behalf of the City of Santa Ana, we thank the Governor and the California Water Resources Control Board in your efforts to manage California’s water resources during this record four year drought. The Board has shown an exceptional level of leadership in dealing with tough issues all across the state.

We appreciate the effort that the Water Board staff has put into developing the Draft Emergency Regulations. We believe the restrictions imposed will achieve the statewide reduction goal of 25%. In addition, your proposed regulations are straightforward and easy to understand.

However, in reviewing the proposed water use reduction levels on each water supplier, we are perplexed that credit was not given to the Orange County Water District groundwater producers for its successful use of recycled water for ground water replenishment. This activity is known as Indirect Potable Reuse (IPR). We believe that discounting our recycling efforts may discourage other agencies from exploring such initiatives, and treating IPR differently than other recycled water systems may undermine the state policy of encouraging and expanding the use of recycled water. We request that the Board adjust the gallons per capita day (GPCD) for water systems that pump IPR through the Ground Water Replenishment System.

The Governor’s Executive Order also includes a blanket request to prohibit the use of potable water to irrigate ornamental turf on public street medians. This decision affects the look, feel, and therefore, the livability of our many communities. We request that such a mandate be left to the local agencies to prioritize, as long as the overall mandated reduction has been met.
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We encourage the board to revise the proposed regulation to allow for alternative compliance methods or just remove these specific requirements and allow the local agencies some latitude to make these tough decisions. 

Thank you in advance for reconsidering these items. The City of Santa Ana will continue to support your efforts toward solving California's water emergency. If you have any questions, feel free to contact me at (714) 647-5654.

Sincerely,

Fred Mousavipour  
Executive Director  
Public Works Agency

c: City Manager  
   City Attorney  
   Water Resources Manager