

**From:** [Teresa Chase](#)  
**To:** [DWR Water Use Efficiency; commentletters; Berbach, Martin@DWR](#)  
**Subject:** Proposal to Implement Executive Order through Water Shortage Contingency Plans and Long-Term Water Use Targets  
**Date:** Friday, September 16, 2016 3:55:32 PM  
**Attachments:** [2016-09-16 SWRCB Comment letter North San Diego Water Reuse Coalition.pdf](#)

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Dear Mr. Berbach and Ms. Townsend,

Attached is a comment letter regarding the proposal to implement the Governor's Executive Order through Water Shortage Contingency Plans and Long-Term Water Use Targets from the North San Diego Water Reuse Coalition.

Please confirm receipt of this email.

Thank you,

Teresa

Teresa L. Chase  
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Encinitas, CA 92024  
760-415-3458



**NORTH SAN DIEGO  
WATER REUSE**  
c o a l i t i o n

September 16, 2016

California Department of Water Resources  
Attn: Marty Berbach, Senior Environmental Scientist  
Water Use Efficiency  
901 P Street  
Sacramento, CA 95814

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

VIA EMAIL: [WUE@water.ca.gov](mailto:WUE@water.ca.gov); [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**Re: Comment Letter – Proposal to Implement Executive Order through Water Shortage Contingency Plans and Long-Term Water Use Targets**

Dear Mr. Berbach and Ms. Townsend,

On behalf of the North San Diego Water Reuse Coalition, thank you for the opportunity to provide the Department of Water Resources and the State Water Resources Control Board with input on the development of Water Supply Contingency Plans and new long-term water use targets for urban water agencies.

The North San Diego Water Reuse Coalition is comprised of ten northern San Diego County water and wastewater agencies—Carlsbad Municipal Water District, City of Escondido, Leucadia Wastewater District, City of Oceanside, Olivenhain Municipal Water District, Rincon del Diablo Municipal Water District, San Elijo Joint Powers Authority, Santa Fe Irrigation District, Vallecitos Water District, and Vista Irrigation District—that began collaborating in 2010 to reduce potable water use and strengthen local drought resilience at a regional level through water recycling and reuse.

The Coalition developed a Regional Recycled Water Facilities Plan in 2012, and many individual construction elements of the Coalition's Regional Recycled Water Project are underway. Upon completion of all long-term project elements, the project will add nearly 32 million gallons per day of recycled water and potable reuse water to northern San Diego County's water supply.

Given significant investments in the project by both the Coalition's ratepayers and by DWR via the Integrated Regional Water Management Program, the Coalition asks that DWR and the State Board recognize the importance of developing local, drought-resilient supplies that not only reduce demand on imported water but also reduce wastewater discharges to the Pacific Ocean. To do so, the Coalition strongly encourages that DWR and the State Board consider the following recommendations when developing the new long-term water use regulations.

Foremost, mandated reductions on recycled water consumption should be avoided as the Executive Order states agencies need to "strengthen local drought resilience," and recycled water is one of the best tools to do just that.

Reduced GPCD may also impact wastewater systems, so a study should be conducted as to specifically determine these impacts. Failing to consider impacts to wastewater plants and sanitation systems could be devastating. Further, it should be recognized that investments in drought-resilient supplies are an integral component of water shortage contingency plans in our region, so the expansion of these resources should not be stifled by imposing restrictions and discrediting recycled water as a supply source.

Additionally, water use targets should be applied only to imported water; drought-resilient supplies such as recycled water should be excluded in order to recognize the reliability of these sources. Years of planning for recycled water could be detrimentally affected if the water use targets include recycled water. SB x7-7 specifically did not include recycled water. Why change course after years of planning and efforts by public agencies to utilize recycled water as a sustainable supply, reducing ocean discharge?

Finally, it is important to recognize that ever-increasing number of state mandates puts undue burden on water and wastewater agencies, and increased costs resulting from new regulations will necessarily be passed on to ratepayers.

The State of California should be commending and rewarding actions that facilitate the development of sustainable practices, such as recycled water production. If you or your staff should need any additional details pertaining to this assessment of the proposal to implement the Executive Order, please do not hesitate to contact me at 760-753-6466.

Regards,

A handwritten signature in black ink that reads "Kimberly A. Thorner". The signature is written in a cursive, flowing style.

Kimberly A. Thorner  
General Manager  
Olivenhain Municipal Water District

CC: Wendy Chambers, General Manager, Carlsbad Municipal Water District  
Christopher McKinney, Utilities Director, City of Escondido  
Paul Bushee, General Manager, Leucadia Wastewater District  
Cari Dale, Water Utilities Director, City of Oceanside  
Greg Thomas, General Manager, Rincon del Diablo Municipal Water District  
Mike Thornton, General Manager, San Elijo Joint Powers Authority  
Mike Bardin, General Manager, Santa Fe Irrigation District  
Tom Scaglione, Interim General Manager, Vallecitos Water District  
Eldon Boone, General Manager, Vista Irrigation District  
Wade Crowfoot, Deputy Cabinet Secretary, Office of Governor Edmund G. Brown, Jr.  
Assemblywoman Marie Waldron  
Assemblyman Rocky Chavez  
Assemblyman Brian Maienschein  
Assemblywoman Toni Atkins  
Senator Pat Bates  
Senator Joel Anderson  
Senator Marty Block  
Mark Weston, Board Chairman, San Diego County Water Authority  
Tom Howard, Executive Director, State Water Resources Control Board  
Caren Trgovcich, Chief Deputy Director, State Water Resources Control Board  
Planning and Performance  
Max Gomberg, Climate Change Mitigation Strategist, State Water Resources Control  
Board  
Peter Brostrum, Department of Water Resources  
Dave Bolland, Director of Regulatory Relations, Association of California Water Agencies