

**Colvin, Judith**

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**From:** mweo-bounces@water.ca.gov on behalf of Mary Grace Pawson [MaryGracePawson@w-and-k.com]  
**Sent:** Thursday, March 27, 2008 2:19 PM  
**To:** mweo@water.ca.gov  
**Cc:** Patricia Tennyson  
**Subject:** [MWEO] WateReuse Association Comments on the Model Water EfficientLandscape Ordinance  
**Attachments:** Final Letter.DOC



# WATER REUSE ASSOCIATION

## CALIFORNIA SECTION

December 21, 2007

Via Electronic Mail

Department of Water Resources  
Office of Water Use Efficiency and Transfers  
Attention: Judy Colvin  
P.O. Box 942836  
Sacramento, CA 94236-0001  
[mweo@water.ca.gov](mailto:mweo@water.ca.gov)

**RE:** Comments on Proposed Model Landscape Ordinance

Dear Ms. Colvin,

The California Section of the Water Reuse Association is pleased to submit comments on the Department's Proposed Model Water Efficient Landscape Ordinance. The California Section of the Water Reuse Association is a non-profit organization with a mission to promote responsible stewardship of California's water resources by maximizing the safe, practical, and beneficial use of recycled water. We appreciate the Department's emphasis on water use efficiency and are committed to working with you enhance efficiency throughout the California. We compliment the Department's work to support recycled water use by encouraging it through this Model Ordinance.

It is in this spirit that we offer two comments for your consideration.

***Existing requirements for recycled water use in landscapes meet the intent of the Model Water Efficient Landscape Ordinance. The Model Ordinance should recognize this and exempt landscapes that utilize recycled water from developing duplicate information.***

When recycled water is used for landscape irrigation, this use is subject to regulation as outlined in Water Code Section 13500 et seq and California Code of Regulations, Title 22 Section 60301 et seq. Under these regulations, an Engineering Report is developed for sites irrigated with recycled water. These reports provide detailed and specific information on:

- the application rate for the recycled water;
- the methodology that will be used to control irrigation rates and prevent overspray and runoff from the irrigated areas;
- site signage and cross connection control;
- user training.

Both the regional water quality control boards and the California Department of Public Health have a role in permitting and overseeing the use of recycled water for landscape irrigation and

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recycled water producers report regularly to these state agencies. As such, landscapes that use recycled water for irrigation are currently the most consistently well-managed class of landscapes in the State.

Because of the existing requirements for recycled water use, recycled water purveyors already comply with the intent of the Model Water Efficient Landscape Ordinance through their Engineering Reports and permit requirements.

As such, we respectfully request that the Department modify Section 492.16 to clearly exempt landscapes using recycled water from the provisions of 492.1 through 492.15 and 492.18, as long as the design and management of that landscape is covered in an approved Engineering Report developed in accordance with provisions of the Water Code and Title 22 of the California Code of Regulations.

***The TDS level set for leaching fraction allowance in Section 492.16.4 is impractically high and should be reconsidered in light of industry management practices.***

Most recycled water purveyors deliver recycled water with a TDS under 2,000 mg/l in order to meet customer needs. Even at this TDS level, landscape managers often adjust their irrigation practices for irrigation water quality and the specific needs of plant materials. We encourage the Department to incorporate the work of the United States Department of Agriculture's Salinity Laboratory in its analysis and to consider a more flexible formula for calculating a leaching fraction that includes the plant material salinity threshold as well as the recycled water quality. The WateReuse Association's member agencies are experienced recycled water purveyors and landscape managers and are available to provide additional consultation with the Department.

Please feel free to contact Ms. Mary Grace Pawson, the chair of our Legislative and Regulatory Committee, at (707) 523-1010 if you have questions or need additional information.

Sincerely,



Past -President, WateReuse Association of California

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