

DATE ISSUED: April 21, 2004 REPORT NO. 04-084

ATTENTION: Natural Resources and Culture Committee
Agenda of April 28, 2004

SUBJECT: Recycled Water Mandatory Reuse Criteria: Interim Report

SUMMARY

THIS IS AN INFORMATION ITEM ONLY. NO ACTION IS REQUIRED ON THE PART OF THE COMMITTEE.

On July 24, 1989 the San Diego City Council approved Ordinance 0-17327 (“Mandatory Reuse Ordinance”) which specified that “recycled water shall be used within the City where feasible and consistent with the legal requirements, preservation of public health, safety and welfare, and the environment.” On December 9, 2002 San Diego City Council passed Resolution R-297487 authorizing City Staff to work in conjunction with the Public Utilities Advisory Commission (PUAC) to develop specific criteria and procedures for enforcing the Recycled Water Mandatory Reuse Ordinance. This information report summarizes the department’s efforts to date, and identifies the timetable for bringing forward final recommendations.

BACKGROUND

In order to develop specific reuse criteria for both new development and “retrofit” arenas, City Staff met with the PUAC Subcommittee on Water & Wastewater Service Delivery. As a result of these efforts, an initial draft of proposed criteria for both retrofit and new development projects has been developed which balances proximity to recycled water pipelines, cost of conversion, and amount of potential recycled water usage as factors in determining specific property and facilities that will be required to use recycled water. In general, this draft criteria mandates customers whose property is immediately adjacent to an existing recycled water pipeline, and who currently use 20 acre feet per year or more of potable water for irrigation purposes, to retrofit their property for recycled water. For new development, the draft criteria will continue to require the conditioning of plans to require recycled water use for irrigation purposes regardless of amount of projected consumption. In addition, the draft criteria has

recommended new buildings and facilities to be required to use recycled water for cooling tower and sanitary uses if specific building size or water consumption thresholds are met.

Recycled Water Program staff has made presentations to 20 community groups and other interested parties to collect input and feedback on the initial draft criteria, as well as to identify existing barriers to the use of recycled water. (See Attachment 1: Community Presentations.) Based on input obtained during those presentations, the initial draft criteria were revised and presented to the full PUAC on November 17, 2003.

In addition, while developing criteria for mandatory reuse, program staff also undertook a customer development analysis to identify how recycled water can be effectively marketed to potential customers who do not fall within the mandatory criteria. The result of this analysis is a series of recommendations regarding improved public education and communication, as well as targeted customer management. The full scope of these recommendations will be presented for approval in conjunction with the final mandatory criteria.

DISCUSSION

Since November 2003, staff has made additional presentations to targeted stakeholders regarding the proposed Mandatory Reuse Criteria in an effort to fully anticipate the impact the draft criteria will have as well as identify any potential mitigation to these impacts. The Water Department recently met with representatives of Building Owners and Managers Association (BOMA), the San Diego Regional Chamber of Commerce, as well as the San Diego Regional Economic Development Corporation (SDREDC). These representatives expressed a concern regarding the economic impact of the proposed requirement that new buildings over 55 feet in height be dual plumbed to accept recycled water for sanitary uses (toilet and urinal flushing). As a result, a meeting with these representatives as well as representatives of the building construction industry is being set to discuss the department's assessment of the economic impact of its proposed dual-plumbing criteria on overall construction costs. These stakeholders have also suggested modification of the department's proposed criteria regarding the use of recycled water for manufacturing purposes. The department is evaluating these suggestions and is considering revising its draft criteria based upon this feedback.

The Industrial Environmental Association (IEA) has expressed concern with the feasibility of using recycled water for cooling towers. As a result, staff is finalizing a report which addresses both the health and safety concerns of recycled water usage for cooling towers, as well as identifies the impact of its use on the overall maintenance of these units. The department is coordinating a meeting with IEA representatives in May to review this report.

Finally, in response to widespread concern regarding the impact of retrofit expenditures on individual customers, the department has continued to research potential financial incentives that could be made available to customers required to retrofit property for recycled water use. In addition to previous examinations on private loan programs, current efforts include discussion with the Metropolitan Water District of Southern California and on-going discussion with a private engineering firm regarding the feasibility of utilizing a performance-based contracting model as means by which retrofits could be accomplished without the burden on the customer of up-front capital outlay. The department is reviewing the details of each of these options to

determine more definitively their feasibility prior to forwarding the final reuse criteria to the NRC for consideration.

The department is scheduled to meet with these above stakeholders within the next three weeks to review the proposed criteria and evaluate potential changes. Should this result in modifications to the criteria as they are currently proposed, the department will request Public Utility Advisory Commission approval of these at the commission's June 21 meeting. As a result, the department expects the final criteria to be forwarded for consideration by the Natural Resources and Culture Committee at its July 17, 2004 meeting.

Respectfully submitted,

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Approved by: Richard Mendes
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Attachment: [1. Community Presentations](#)