3/20/07 BdWrshp Item 8
Water Recycling
Deadline: 3/27/07 5 pm

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1149 SOUTH BROADWAY, 9TH FLOOR
LOS ANGELES, CA 90015
TEL: (213) 485-2210
FAX: (213) 485-2979

March 27, 2007

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Executive Ofc.

Ms. Song Her
Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, California 95812-0100

COMMENT LETTER- 3/20/07 BOARD MEETING AGENDA ITEM 8, WORKSHOP REGARDING DEVELOPMENT OF A STATEWIDE WATER RECYCLING POLICY

Dear Ms. Her:

The City of Los Angeles' Bureau of Sanitation (Bureau) appreciates the opportunity to provide comments on the State Water Resources Control Board's (State Board's) effort to develop a Statewide Water Recycling Policy and the issues this policy addresses. As a producer of recycled water, the Bureau believes that timely development of a consistent statewide policy is essential to advancing the use of recycled water in California. A consistent statewide policy that protects groundwater but does not burden water recycling projects with overly restrictive regulations and added costs for compliance is essential to developing future recycled water projects. This is especially true for simple irrigation projects in which overly conservative regulations could result in extensive groundwater monitoring and the drilling of new monitoring wells each time a new irrigation project is undertaken. The Bureau strongly supports the State Board's effort to develop a statewide water recycling policy that creates a consistent statewide regulatory framework, which encourages the use of recycled water.

Irrigation Projects and Salts

The Bureau does not believe that simple irrigation projects require groundwater monitoring. Recycled water irrigation projects are designed and operated to minimize incidental percolation or runoff. While groundwater monitoring permit conditions might be appropriate for an indirect potable reuse groundwater recharge project, watering grass is not a groundwater recharge project. Due to the concerns of increasing levels of chlorides concentrations in recycled water

resulting from increasing levels in potable supplies, groundwater monitoring to protect groundwater basins from increasing chloride concentrations is being implemented at the local level. The implementation of groundwater monitoring for irrigation projects would not encourage the use of recycled water and could put existing and new projects in jeopardy, especially if the drilling of new wells is required for monitoring.

The Bureau takes the position that the monitoring of irrigation projects to protect groundwater basins from "incidental percolation" is overly restrictive and adds unnecessary costs. Irrigation projects are designed to minimize incidental percolation and runoff. Instead of requiring monitoring for these low risk projects, local Regional Water Quality Control Boards should rely on a "mass balance or salt balance" approach to analyzing the potential impact of recycled water irrigation projects. This is a method that utilizes existing data and can be performed at a reasonable cost keeping it within reach of smaller communities with limited budgets and resources. This method was presented in detail in the Draft State Water Resources Control Board Guidance for Implementing State Statutes, Regulations, and Policies for Recycled Water Projects (Draft Guidance Document) which was prepared by State Board staff and the California WateReuse Association with stakeholder input. The Draft Guidance Document includes two examples of how to perform a mass balance analysis, one of which is the conservative worst case analysis performed in the City of Los Angeles. This analysis includes an assessment of outdoor water use in areas overlying a subject groundwater basin including imported water sources, local water sources, recycled water, and any other contributing sources. In cases where water pumped from a groundwater basin is not typically used within the basin itself, then over a long period of time groundwater would be expected to reach steady state conditions with salinity concentrations similar to the average of the water applied over the basin. If groundwater is used (recirculated) within the basin, then this should be considered as well, as it may lead to a gradual increase in groundwater salinity. The average historical and anticipated salinity concentration of the water used over a groundwater basin will provide an immediate view of potential long term salinity trends that might occur in groundwater (an early warning), when relying on groundwater monitoring may not show changes in groundwater salinity concentrations until they are well underway.

Furthermore, if assimilative capacity exists in groundwater basins then this should be allocated to projects using recycled water. As stated above, there is minimal recharge from irrigation projects. When all of the inputs into an aquifer are considered, groundwater basins may have assimilative capacity, which should be allocated to projects using recycled water due to the significant water supply benefits it provides for this State. The State has set a goal to recycle one-million acre-feet of water by 2010, yet only about half this amount of water is currently being recycled. Local and regional urban water management plans and the State Water Plan are relying heavily on the increased use of recycled water as part of future water supplies. Currently, irrigation use comprises approximately 67% of recycled water used in California, and hindering the development of such projects will greatly diminish the ability to achieve these water recycling goals possibly resulting in future shortages of potable water. Requiring groundwater monitoring is unnecessary when simple and effective tools such as a mass balance can provide an immediate view of potential long term salinity standards.

If you have any questions regarding the Bureau's comments, please contact H.R. (Omar) Moghaddam at (310) 648-5423 or Gus Dembegiotes at (310) 648-5493 of the Regulatory Affairs Division.

Sincerely,

RITA L. ROBINSON, Director
Bureau of Sanitation

cc: Jonathan Bishop, RWQCB
Nancy Sutley, Mayor's Office
Cynthia Ruiz, Board President, Board of Public Works
Rafael Prieto, Chief Legislative Analyst Office
James B. McDaniel, LADWP
Enrique Zaldivar, Bureau of Sanitation/EXEC
Traci Minamide, Bureau of Sanitation/EXEC
Varouj Abkian, Bureau of Sanitation/EXEC
H.R. (Omar) Moghaddam, Bureau of Sanitation/RAD