



DONALD L. WOLFE, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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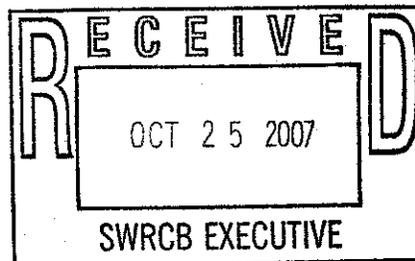
12/4/07 Bd. Mtg.
Water Recycling Policy
Deadline: 10/26/07 Noon

ADDRESS ALL CORRESPONDENCE TO:
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IN REPLY PLEASE
REFER TO FILE: **WW-1**

October 25, 2007

Ms. Jeanine Townsend
Acting Clerk to the Board, Executive Office
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100



Dear Ms. Townsend:

LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40, ANTELOPE VALLEY COMMENTS ON THE STATE WATER RESOURCES CONTROL BOARD'S PROPOSED WATER RECYCLING POLICY AND DRAFT STAFF REPORT

Enclosed are the Los Angeles County Waterworks District No. 40, Antelope Valley's comments on the State Water Resources Control Board's proposed Water Recycling Policy.

If you have any questions, please contact Mr. T. J. Kim at (626) 300-3327.

Very truly yours,

DONALD L. WOLFE
Director of Public Works

ADAM ARIKI
Assistant Deputy Director
Waterworks Division

TJ:lr
DLB255

Enc.

**LOS ANGELES COUNTY WATERWORKS DISTRICT NO. 40, ANTELOPE VALLEY'S
COMMENTS ON STATE WATER RESOURCES CONTROL BOARD'S
PROPOSED WATER RECYCLING POLICY**

The Los Angeles County Waterworks District No. 40, Antelope Valley (District) would like to thank the State Water Resources Control Board (State Water Board) for its leadership in developing the Water Recycling Policy (Policy) to promote the use of recycled water. The State Water Board is making commendable efforts to achieve consistency in water recycling permitting and regulation.

A significant amount of the water currently used within the Antelope Valley is imported; therefore, it is susceptible to reduction and interruption. Droughts, earthquakes, and environmental impacts can all result in both temporarily and permanently reduced supplies to the Valley. Maximizing local supplies, including recycled water, is critically important to provide long-term stability and reliability to the Valley's water supplies. The District supports the development of a Policy that recognizes and treats recycled water as a resource rather than a waste.

Following are the District's comments on the Policy:

1. The District supports the requirement that directs the Regional Water Quality Control Boards (Regional Water Boards) to adopt revised salts implementation plans by January 1, 2018, for those groundwater basins within their regions where water quality objectives for salts are being, or are threatening to be, violated. We believe development of such plans with sufficient time will allow the Regional Water Boards, and producers and distributors of recycled water to work together to define the long-term beneficial uses of their groundwater basins, including the use of groundwater basins for storage, and to identify and implement comprehensive management strategies for protecting these beneficial uses.
2. The District generally supports the proposed requirements for the use of recycled water for irrigation; however, the District has the following specific comments and suggestions. First, the Policy set the monthly average Total Dissolved Solids (TDS) concentration in the recycled water not to exceed the monthly average TDS concentration of the source water supply, plus 300 mg/L; however, the basis for the 300 mg/L increment for TDS is not clear. We recommend that recycled water irrigation projects that meet the numerical groundwater objectives for TDS in the basin plans should be approved without further conditions. Second, the Policy allows a Regional Water Board to require groundwater monitoring for recycled water irrigation projects if it determines that site conditions could cause an increased potential for the irrigated site to adversely affect public health or surface water quality. We believe such groundwater monitoring should be required only when the Regional Water Board can scientifically prove significant adverse impacts on public health or water quality.

3. The District is concerned that for a groundwater recharge reuse project a Regional Water Board is allowed to interpret a narrative objective for toxicity for protection of human health to establish an effluent limitation for a constituent for which the California Department of Health Services (CDPH) has not established a Maximum Contaminant Level (MCL). CDPH is responsible for establishing MCLs for constituents in drinking water to protect the health of the public who drink water supplied by water utilities, and these MCLs are adopted through an extensive scientific and public review process. Therefore, we believe a Regional Water Board should be allowed to establish the effluent limitations for protection of public health, only for the constituents for which CDPH has established the MCLs, at concentrations equivalent to the MCLs.
4. The District supports State Water Board's finding that benefits of recycled water irrigation and groundwater recharge reuse projects outweigh the costs associated with lowering of water quality that would be caused by such projects, and its intent to develop the uniform statewide recycled water projects requirements.

We appreciate the opportunity to comment on this important water policy. If you have any questions, please contact Mr. T. J. Kim at (626) 300-3327.