



# Central Basin

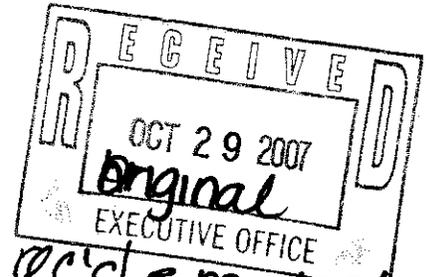
Municipal Water District

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October 26, 2007

Ms. Tam M. Doduc, Chair and Members  
California Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100



rec'd e-mail 10/26  
@ 3:27 PM

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Attention: Jeanine Townsend, Acting Clerk to the Board  
(commentletters@waterboards.ca.gov)

## Comments on Draft Recycled Water Policy

Dear Chair Doduc and Members of the Board:

Central Basin Municipal Water District (Central Basin) is a public agency in Southeast Los Angeles County serving a population of more than 2 million. Central Basin provides imported water to 26 cities, mutual water companies, investor-owned utilities and private companies throughout the service area. In addition to imported water, Central Basin provides recycled water for municipal, commercial and industrial use as a supplementary source of supply. The use of recycled water is the cornerstone of Central Basin's water management philosophy. As such, Central Basin strongly supports the State Water Resources Control Board's (SWRCB) development of a statewide recycled water policy.

### Central Basin Service Area

For the Central Basin area, recycled water has found its place as a consistently reliable local source of water for non-potable purposes. A total of seventeen retail water agencies are currently serving recycled water to over 235 individual sites. Although the majority of use is landscape irrigation, recycled water is also being used for carpet dyeing, cement manufacturing, and cooling.

### Central Basin Recycled Water Program

As of fiscal year (FY) 2006-07, the Central Basin recycled water system provides over 5,300 acre feet per year (AFY). Combined with the

separate recycled water systems serving the Cities of Cerritos and Lakewood, the Central Basin service area uses about 8,000 AFY, which is 3 percent of all municipal and industrial water demands. If recycled water was not available, the Central Basin service area would be using imported water from the Colorado River and/or from the California Delta because groundwater sources are being maximized. Finally, recycled water continues to be used with imported water and stormwater sources to replenish the Central Groundwater Basin as it has for the last forty years. The use of recycled water is carefully monitored through the permit process developed by the Los Angeles Regional Water Quality Board (LARWQB). Without recycled water, the Central Basin service area would be much more dependent on imported water sources throughout the year.

With our partners, the Los Angeles County Department of Public Health, the County Sanitation Districts of Los Angeles County (CSDLAC), and our recycled water system operators, Central Basin provides the utmost quality recycled water possible. Clearly, recycled water provides a benefit that reaches all segments of our society.

#### Recycled Water Policy

The SWRCB has taken a commendable leadership position in recognizing and developing a policy that is clearly overdue. California's long-term water supply situation demands that recycled water be used to the maximum benefit possible throughout the state to reduce the stress on imported and local water sources. Central Basin has several recommendations on how the draft policy could be modified:

- **Recycled Water Targets**  
The State of California currently uses about 500,000 AFY of recycled water, but the draft policy does not seem to identify any particular targets for future use. Section 13577 in the Water Code already identifies the goal of 1 million AFY by 2010. We believe the recycled water policy should reflect this goal and should set new statewide targets for 2020 and 2030.
- **Total Dissolved Solids (TDS)**  
The draft policy correctly identifies salt accumulation in groundwater as a significant problem that should be addressed by regional salt management strategies. The use of recycled water for irrigation has only incidental effects on groundwater quality. Indeed, when compared with overall qualities of surface water and groundwater production and distribution, recycled water could only have minimal impacts, if any.

We appreciate that the draft policy distinguishes between irrigation and recharge projects, but still question the impacts of recycled water on groundwater quality. As an example, recycled water has been used as recharge water (blended with stormwater and imported water) in the Central Groundwater Basin for the last forty years. Currently, groundwater quality data generally shows TDS levels of between 250 to 750 mg/L across the basin. Therefore, we agree that salt accumulation should be addressed in regional plans and not look exclusively at recycled water.

The draft policy also identifies the control of industrial discharges and self-regenerating water softeners as a method to limit TDS to under 300 mg/l. This approach, while probably effective, can be very difficult if not impossible to enforce due to jurisdictional conflicts. Therefore, Central Basin supports a *statewide* effort to control these two sources that effect local TDS. However, Central Basin is strongly supportive of a *regional* TDS incremental limit that takes the entire watershed into consideration and not just on a project-by-project basis. A "one size fits all" approach for salt management could negatively affect existing recycled water projects and would most certainly limit new projects. Central Basin recommends allowing lead agencies to work with their regional boards on TDS limits that are consistent with local management plans.

- **Nutrient Management Plans**

The draft policy identifies nutrient management plans as the method of reducing discharges of nitrates into groundwater. Similarly to salts, nutrients are a problem, but they should be addressed as a watershed issue and not on a recycled water project by project basis.

- **California Department of Public Health**

Central Basin continues to maintain a strong working relationship with the Los Angeles County Department of Public Health which enforces the California Department of Public Health (DPH) regulations regarding recycled use. We recommend that the draft policy identify DPH as the central authority on the protection of human health and that the Regional Water Quality Control Boards shall coordinate their policies with DPH.

It is our understanding that the WateReuse Association will be providing expanded or additional comments on the draft policy. WateReuse has engaged many agencies that could be affected by the new policy and Central Basin supports their efforts.

Again, we appreciate your attempts to create a policy that will help expand the use of recycled water and benefit all Californians now and in the future. If you have any questions, please contact the Deputy General Manager Joone Lopez at (310) 436-2604 or e-mail at [joonel@centralbasin.org](mailto:joonel@centralbasin.org).

Sincerely,



Art Aguilar, General Manager  
Central Basin Municipal Water District

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CC: CBMWD Board of Directors