



# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

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DONALD L. WOLFE, Director

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

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

October 25, 2007

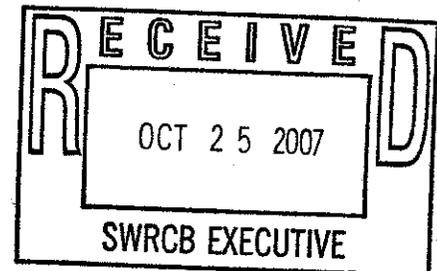
IN REPLY PLEASE

REFER TO FILE: A-0

Ms. Tam Doduc, Chair  
California State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-100

Dear Ms. Doduc:

### COMMENT LETTER PROPOSED WATER RECYCLING POLICY



The County of Los Angeles Office of Water Recycling appreciates the opportunity to review and comment on the State Water Board Water Recycling Policy (Policy). The Office of Water Recycling supports the development of a Policy that recognizes and treats recycled water as a resource rather than a waste. The Policy should clearly state that the Board supports utilizing recycled water as a valuable resource.

The County of Los Angeles is a member agency of the WaterReuse Association and has participated in the development of comments submitted by the WaterReuse Association. The comments provided by the WaterReuse Association in their submittal are supported by the Office of Water Recycling. In addition, we have the following comments.

The Policy should clarify which elements apply to irrigation projects, which apply to groundwater recharge projects, and which apply to both. The Policy should specifically limit monitoring requirements to only groundwater recharge projects. Since the Policy requires irrigation projects to apply recycled water at the rate needed for the landscape or crop, the impact of the irrigation project on groundwater is either eliminated or reduced to insignificance. Requiring groundwater monitoring for irrigation projects would make many irrigation projects economically infeasible without a justifiable purpose for the additional expense.

The Office of Water Recycling supports developing basin-wide salt management plans by 2018 to ensure the sustained use of groundwater and to preserve groundwater quality. Until the Regional Boards develop basin-wide salt management plans, there is a need for an interim approach to manage salts. However, the proposed limit of no more than a 300 mg/L increase in TDS for irrigation projects utilizing recycled water will not facilitate recycled water use. We suggest modifying the Policy for projects using recycled water as follows:

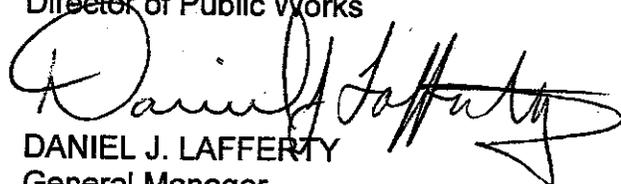
1. Projects consistent with a regional salt management plan developed with stakeholder involvement should be approved without further conditions.
2. Projects that meet the numerical groundwater objective for TDS should be approved without further conditions.
3. Projects with TDS at or below the TDS concentration of the underlying groundwater where there is no numerical groundwater objective for TDS should be approved without further conditions.
4. Projects that do not satisfy conditions 1, 2, or 3 above but with a TDS concentration no more than 550 mg/l above the area's source water TDS concentration should be approved without further conditions.
5. Projects that do not satisfy conditions 1, 2, 3, or 4 above should be permitted on a case-by-case basis and contain permit conditions reflective of the particular situation for that project.

Overspray from normal irrigation operations that results in recycled water runoff should be managed and permitted using existing regulatory mechanisms. These mechanisms include, but are not limited to, municipal separate storm sewer system permits and low-threat discharge permits.

We appreciate the efforts of the State Water Board to implement California's water recycling goals. Revising the Policy to include the modifications suggested above and in the comment letter from the WaterReuse Association will enhance implementation of recycled water projects throughout California.

Very truly yours,

DONALD L. WOLFE  
Director of Public Works



DANIEL J. LAFFERTY  
General Manager  
Office of Water Recycling

DJL:dh