



Public Comments  
Report to the Legislature on DPR  
Deadline:10/25/16 12:00 noon



October 25, 2016

Chair Felicia Marcus and Board Members  
c/o Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814  
Sent via electronic mail to: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**RE: Comment Letter - Report to the Legislature on DPR**

Dear Chair Marcus and Board Members:

On behalf of the undersigned Los Angeles-based environmental groups, we are writing to urge the State Water Resources Control Board to move forward with the development of criteria for Direct Potable Reuse (DPR) as expeditiously as possible while still being protective of public health and safety.

DPR is a critical strategy for the Los Angeles region to develop local, cost-effective, and environmentally- and climate-friendly water supplies that will serve our most essential need – namely, drinking water. Despite significant progress in recent years, the Los Angeles metropolitan area still imports substantial water from outside the region, making water supply less reliable for our communities while also imposing significant economic and environmental costs across the state and region. At the same time, we discharge billions of gallons of treated wastewater into the region’s coastal waters and inland waterways – water that can be purified to replenish our local aquifers.

California and the LA-region have always been on the cutting edge of Advanced Treated Water (ATW), including Indirect Potable Reuse (IPR) projects, such as the Orange County Groundwater Replenishment System, Alamitos Barrier Project, Dominguez Gap Barrier Project, and West Coast Basin Barrier Project. But to remain a national leader, California must continue to move forward on the development of DPR criteria. In 2009, California set a goal to increase the use of recycled water by at least one million acre-feet per year above 2002 levels by 2020 and two million acre-feet per year above 2002 levels by 2030, or approximately 1.5 million acre-feet per year by 2020 and 2.5 million acre-feet per year by 2030.

Meanwhile, the City of Los Angeles has set goals to reduce the purchase of imported water by 50% by 2025 and source 50% of water locally by 2035, including increasing the use of recycled water by at least 50,000 AFY by 2019 to help us achieve these goals.

DPR is a crucial tool to meet our local and state water recycling goals. While the City of Los Angeles, West Basin Municipal Water District, Metropolitan Water District of Southern California, County of Los Angeles and other local agencies are all exploring or developing IPR projects, there can be local circumstances under which DPR is likely to be more cost effective. While the undersigned groups believe there are tremendous opportunities available to pursue IPR projects throughout the LA region, we also believe DPR can play an important and complementary role in enhancing local water supplies. DPR can also help alleviate the need for more expensive, energy-intensive and environmentally harmful options to enhance the region's water supplies. Simply put, DPR can be a game-changer in California's and LA's drive to meet our water recycling and water security goals.

As such, the State Water Board should begin developing DPR criteria immediately, but the criteria should be developed concurrently with the DPR Expert Panel's recommended research. If the research is not done concurrently, we fear the State Water Board will be constrained in its ability to adopt meaningful regulations due to lingering scientific unknowns. Alternatively, if the State Water Board were to develop the criteria concurrently with the recommended research, then the criteria can be tailored to the best available science – protecting public health while providing project proponents with the flexibility necessary to conduct DPR operations. The undersigned groups urge the State Water Board to continue its momentum towards the development of DPR criteria, but develop the criteria in a responsible manner so it matches the best available science. To help California continue to be a leader on ATW, we offer the following recommendations for the final DPR Report:

- Be explicit as to what challenges the State Water Board perceives moving forward – and state clearly how the Legislature, other government agencies, and stakeholders can help overcome those challenges;
- Direct the Legislature to hold a Joint Budget hearing to provide an opportunity to present the DPR Report findings and to discuss additional resources necessary for the Water Board to complete the DPR criteria;
- Uniformly define the types of DPR so that California speaks with the same language as we develop DPR criteria and projects;
- Add more specificity to the Implementation Plan to explain which research recommendations must be completed before the adoption of DPR criteria;
- Incorporate estimated timeframes for when each research recommendation should begin and how long each activity will likely take to complete; and
- Retain the possibility of permitting a DPR project on a case-by-case basis.

We look forward to working with you to ensure that DPR regulations progress in a cautious yet steady manner so that we can reach our water recycling goals and help make local communities climate and drought resilient.

Sincerely,



Bruce Reznik  
*Executive Director, Los Angeles Waterkeeper*



Melanie Winter  
*Founder & Direct, The River Project*



Craig W. Cadwallader  
*Chair, Surfrider Foundation South Bay Chapter*



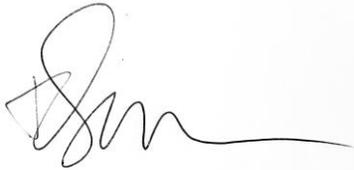
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