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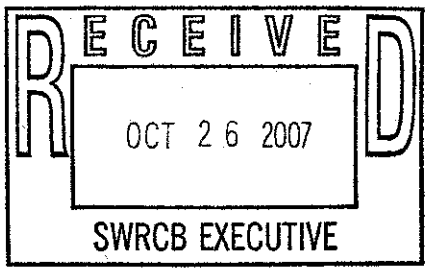
PUBLIC WORKS
DEPARTMENT

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

October 26, 2007

Ms. Jeanine Townsend
Acting Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814



Subject: Draft Recycling Water Policy

Dear Chair Doduc and Members of the Board:

The City of Burbank Public Works Department and Burbank Water and Power (Burbank) appreciate the opportunity to provide comments on the State Water Resources Control Board's (State Board) Draft Proposed Water Recycling Policy, and commend the State Board for their effort to develop a uniform statewide water recycling policy. We applaud the State Board for its leadership in undertaking this policy and offer our comments in the spirit of assisting the Board in achieving its goals to facilitate recycled water use and improve consistency in the permitting process.

While Burbank is supportive of the State Board's proposed policy, the following comments are offered in hopes of the proposed policy fostering consistent application and uniform interpretation of water recycling throughout the state.

1. **Total Dissolved Solids (TDS) should not be set as a requirement in the policy.**

   The TDS requirement in Requirement 7(e) needs to be removed. The policy's requirement limiting TDS to the potable water concentration plus 300 mg/L, in the City of Burbank would make it impossible to irrigate with recycled water during certain times of the year. Irrigation projects with years of usage would be turned off. In addition, because Burbank Water and Power blends water from groundwater and varying sources from the Metropolitan Water District of Southern California (MWD), it would be difficult to calculate the source water's TDS concentration. Additionally, the policy overstates how much control a local agency has in limiting its TDS to potable plus 300 mg/L. State Law makes it difficult to ban the installation of new water softeners and impossible to remove existing water softeners. Additionally, source control of industrial dischargers through a change of local limits may not have the results the policy assumes. The implementation of residential water conservation efforts has the result of increasing the TDS concentration in recycled water; an

increase that may not be able to be overcome by reducing industrial TDS discharge concentrations.

2. **The proposed policy should deal with irrigation projects only.**
Burbank recommends that the policy deal with irrigation projects only. The addition of groundwater recharge requirements unnecessarily complicates the policy. Groundwater recharge projects already have requirements set by the California Department of Public Health (DPH) and are regulated through Waste Discharge Requirements. The policy should instead provide guidance to Regional Water Quality Control Boards in permitting simple irrigation projects. These are projects that have the most immediate potential to aid the State in meeting its goals for recycling water. Many localities may be able to utilize recycled water to irrigate golf courses, parks, cemeteries, and other green areas. The use of recycled water for irrigation is safe and has been in use for years. However, consistent requirements are needed to ensure that this source of water is not regulated out of use. A policy is needed that encourages the development of this water. Irrigation of grass is a poor use of potable water, especially in times of drought. The resulting policy needs to provide clear guidance for these types of projects and should not complicate the issue by adding requirements for groundwater recharge.

3. **The Policy should recognize that groundwater monitoring is not necessary for simple recycled water irrigation projects.**

If the policy is intended to encourage the use of recycled water, it should be clear that groundwater monitoring should not be required for simple irrigation projects. We are concerned with the language in the policy that provides Regional Boards with discretion to require monitoring when there is "shallow groundwater" present. Burbank believes this language could be used to require groundwater monitoring in permits for simple irrigation projects. Agencies or private entities that might be considering the use of recycled water for irrigation projects will not proceed with those projects if groundwater monitoring is required. Any incidental recharge from irrigation projects will have a *de minimus* impact on groundwater. There are many inputs into a groundwater aquifer and irrigation with recycled water is usually a small input into a groundwater basin.

4. **The policy should recognize that incidental runoff of a valuable resource should be treated the same as potable water when used for irrigation.**

The Burbank is concerned that the reference to NPDES permits could be interpreted by Regional Boards as a requirement to control incidental runoff from irrigation projects. Runoff from irrigation projects should be dealt the same as potable water runoff. As the policy notes, recycled water irrigation projects are designed to minimize runoff. Recycled water in the City of Burbank is not free water. Customers who use recycled water still have an economic interest in irrigating efficiently and minimizing runoff. As such, there are existing self-regulatory mechanisms which regulate potable water runoff that are also appropriate for recycled water. If an

NPDES permit is required to regulate recycled water runoff, users will continue to use potable water for irrigation where additional permitting is required.

Burbank believes the recommendations enumerated above will result in a more effective and successful program and thanks the State Board in advance for considering its comments. If you have any questions regarding Burbank's comments, please contact Rodney Andersen, Assistant Public Works Director – Wastewater Systems at (818) 238-3931.

Sincerely,

Rodney Andersen
Assistant Public Works Director – Wastewater Systems

William Mace
Assistant General Manager – Burbank Water and Power

cc: Bonnie Teaford, Public Works Director
Ron Davis, General Manager – Burbank Water and Power