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December 22, 2017



Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
PO Box 100  
Sacramento, CA 95812-0100

Dear Ms. Townsend:

**Subject: Comment Letter – Proposed Recycled Water Policy Amendment - Early Public Consultation**

The Los Angeles Department of Water and Power (LADWP) would like to thank the State Water Resources Control Board (SWRCB) for the opportunity to comment on the Informational document - Proposed Amendment to the Policy for Water Quality Control for Recycled Water (Recycled Water Policy) released November 21, 2017.

LADWP is currently making significant infrastructure investments to address environmental impacts, such as long drought periods due to climate change. Utilizing recycled water can offset potable water demands, which is a key component in reducing overall potable water usage, especially during water shortage periods. LADWP plans to increase recycled water use in its service territory to 59,000 acre-feet per year (AFY) by 2025, and has set a long term goal to reach 75,000 AFY by 2040. As part of reaching this goal, LADWP is always looking for opportunities to expand recycled water use and has developed its Recycled Water Master Plan which has been updated to include other uses such as the use of recycled water for groundwater replenishment and surface water augmentation.

LADWP commends the SWRCB on its continued work on this policy in order to allow for other uses of recycled water since the last amendment in 2013. LADWP provides the following comments on the amendment project description:

**Topic 1: Update monitoring requirements for CECs**

In this topic it states that the monitoring requirements for CECS may be updated based on the Science Advisory Panel's findings.

LADWP supports the need to monitor in order to protect the public and the beneficial uses of the water source. LADWP requests that the update of any monitoring requirement(s) be a public process from the development of which CECs will be



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examined. In addition, it is requested that monitoring requirements are developed on a site by site basis and that the individual applicants who will be administering the permit be notified and are part of the process.

### **Topic 3: Tracking use of recycled water**

The proposed Recycled Water Policy amendment Topic 3 states that language requiring annual reporting of recycled water production, use, and potential by recycled water producers may be required and included in the permits.

LADWP agrees that tracking the use of recycled water is important in order to attain recycled water use goals and mandates. However, it should be noted that the Waste Discharge Requirements (WDRs) already include similar annual reporting requirements. Consistency of information is important for reporting purposes.

Therefore, LADWP recommends streamlining the reporting requirements in order to have consistency with reporting information amongst the permits; this may be done by allowing one report to satisfy the requirement for all permits.

### **Topic 4: Add clarifying language regarding the process to comply with Water Code section 1211**

The proposed Recycled Water Policy amendment will require the application for Water Code Section 1211 to obtain approval from the SWRCB prior to making any change to its point of discharge.

LADWP supports this process to obtain approval for 1211 application. Due to possible regional impacts, LADWP requests that all approval requests be made public in the Region where the 1211 is being sought, in order for all stakeholders to have the opportunity to comment before any action is taken by the SWRCB.

In closing, LADWP appreciates the opportunity to provide comments on the Recycled Water Policy and looks forward to working with SWRCB staff in this process. Should you have any questions regarding this letter, please contact me at (213) 367-0436.

Sincerely,



Katherine Rubin  
Manager of Wastewater Quality and Compliance

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c: Ms. Felicia Marcus, Chair, SWRCB  
Mr. Steven Moore, Vice Chair, SWRCB  
Ms. Tam M. Doduc, SWRCB

Ms. Dorene D'Adamo, SWRCB  
Mr. E. Joaquin Esquivel, SWRCB  
Ms. Katherine Rubin, LADWP