



17140 S. Avalon Blvd.
Suite 210
Carson, CA 90746
310.217.2411
www.westbasin.org

October 24, 2016

Ms. Felicia Marcus and Members of the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100



Re: Comment Letter – Report to the Legislature on Direct Potable Reuse

Dear Chairwoman Marcus:

On behalf of West Basin Municipal Water District (West Basin), I wanted to extend our congratulations and appreciation for the development of Uniform Water Recycling Criteria for Direct Potable Reuse (DPR). This groundbreaking achievement will help further protect California from current and future droughts and drier climate conditions.

West Basin is proud of its history incorporating recycled water in its supply portfolio. With five unique "designer" recycled waters, West Basin has helped to create over 175 billion gallons of new water which has played a crucial role during our prolonged drought. Currently, the largest component of the recycled water program is indirect potable reuse water used for injection into the West Coast Basin Barrier. Partnering with Water Replenishment District of Southern California, West Basin has successfully operated this treatment facility for over 20 years.

West basin has reviewed the draft criteria and strongly supports the recommendations. Working closely with WaterReuse California, West Basin has provided detailed comments in a collaborative approach with other leading water recyclers within the state.

West Basin would only request one additional comment for consideration. With many forms of water recycling in practice within the State, it is important to provide distinction. That especially holds true in the area of Indirect and Direct Potable Reuse. In order to avoid both regulating and public perception confusion, West Basin suggests clarifying nomenclature of the various types of Potable reuse. Monikers or identifiable names of different DPR treatment process trains would provide clarity not only to the water industry but also to the communities that will benefit from these new supplies.

We believe there are five types of Indirect/Direct Potable Reuse types and suggest the following:

1. **Groundwater Augmentation - IPR** (environmental buffer)
2. **Surface Water Augmentation - IPR (type 1)** (6 or greater months retention time)

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3. **Modified Surface Water Augmentation – IPR (type 2)** (Less than 6, but equal to or greater than 2 months retention time with added treatment)
4. **Direct Raw Water Potable Reuse** (water commingled with other raw sources before treatment in a water treatment facility)
5. **Direct Distributed Potable Reuse** (water delivered directly into a drinking water distribution system, this mode has been referred to previously as “flange to flange”)

West Basin also would emphasize the need to further detail the additional DPR research areas that could be conducted concurrently with criteria development. These recommendations are included in the report’s implementation plan. However, some of the research items are fairly broad. This is especially important as the research gaps describe needs determined in concert with existing operating IPR facilities. West Basin looks forward to participating and providing valuable data which will help support the research. Along with WaterReuse California, we request that the Board ask the Expert Panel for more specificity on each of its six research items, helping us to understand how that research can be completed in a timeframe that is also reasonable for criteria development.

West Basin appreciates the opportunity to comment on such an important set of draft criteria.

Sincerely,



Rich Nagel
General Manager
West Basin Municipal Water District