



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

PALMDALE

a place to call home

October 25, 2007

JAMES C. LEDFORD, JR.
Mayor

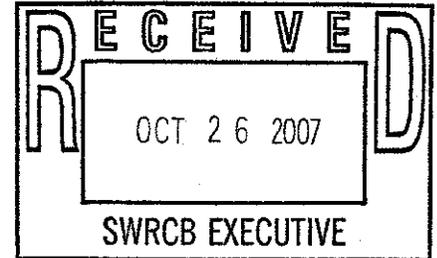
MIKE DISPENZA
Mayor Pro Tem

STEVEN D. HOFBAUER
Councilmember

STEPHEN KNIGHT
Councilmember

TOM LACKEY
Councilmember

Ms. Jeanine Townsend
Acting Clerk to the Board, Executive Office
California State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-100



RE: STATE WATER RESOURCES CONTROL BOARD'S PROPOSED WATER RECYCLING POLICY

Dear Ms. Townsend:

The City of Palmdale would like to thank the State Water Resources Control Board for its leadership in developing the Water Recycling Policy (Policy) to promote the use of recycled water. The Board is making commendable efforts to achieve consistency in water recycling permitting and regulation.

A significant amount of the water currently used within the Antelope Valley is imported; therefore, it is susceptible to reduction and interruption. Droughts, earthquakes, and environmental impacts can all result in both temporarily and permanently reduced supplies to the Valley. Maximizing local supplies, including recycled water, is critically important to provide long-term stability and reliability to the Valley's water supplies. The City supports the development of a Policy that recognizes and treats recycled water as a resource rather than a waste.

Following are the City's comments on the Policy:

1. The City supports the requirement that directs the Regional Water Quality Control Boards to adopt revised salts implementation plans, by January 1, 2018, for those groundwater basins within their regions where water quality objectives for salts are being, or are threatening to be, violated. We believe development of such plans with sufficient time will allow the Regional Water Boards, and producers and distributors of recycled water to work together to define the long-term beneficial uses of their groundwater basins, including the use of groundwater basins for storage, and to identify and implement comprehensive management strategies for protecting these beneficial uses.

Auxiliary aids provided for

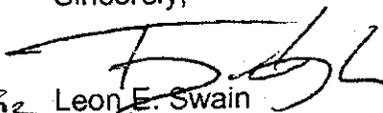
communication accessibility

upon 72 hours' notice and request.

2. The City generally supports the proposed requirements for the use of recycled water for irrigation; however, the City has the following specific comments and suggestions. First, the Policy set the monthly average Total Dissolved Solids (TDS) concentration in the recycled water not to exceed the monthly average TDS concentration of the source water supply, plus 300 mg/L; however, the basis for the 300 mg/L increment for TDS is not clear. We recommend that recycled water irrigation projects that meet the numerical groundwater objectives for TDS in the Basin Plans should be approved without further conditions. Second, the Policy allows a Regional Water Board to require groundwater monitoring for recycled water irrigation projects if it determines that site conditions could cause an increased potential for the irrigated site to adversely affect public health or surface water quality. We believe such groundwater monitoring should be required only when the Regional Water Board can scientifically prove significant adverse impacts on public health or water quality.
3. The City is concerned that for a groundwater recharge reuse project a Regional Water Board is allowed to interpret a narrative objective for toxicity for protection of human health to establish an effluent limitation for a constituent for which the California Department of Health Services (CDPH) has not established a Maximum Contaminant Level (MCL). CDPH is responsible for establishing MCLs for constituents in drinking water to protect the health of the public who drink water supplied by water utilities, and these MCLs are adopted through an extensive scientific and public review process. Therefore, we believe a Regional Water Board should be allowed to establish the effluent limitations for protection of public health, only for the constituents for which CDPH has established the MCLs, at concentrations equivalent to the MCLs.
4. The City supports State Water Board's finding that benefits of recycled water irrigation and groundwater recharge reuse projects outweigh the costs associated with lowering of water quality that would be caused by such projects, and its intent to develop the uniform statewide recycled water projects requirements.

We appreciate the opportunity to comment on this important water policy. If you have any questions, please contact Gordon Phair at (661) 267-5300.

Sincerely,


R2 Leon E. Swain
Director of Public Works

Cc: Stephen H. Williams, City Manager
Laurie Lile, Assistant City Manager