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December 5, 2017

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Los Angeles Regional Water Quality Control Board  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013  
Attention: Dr. Celine Gallon

### **COMMENT LETTER – 2017-19 TRIENNIAL REVIEW OF THE WATER QUALITY STANDARDS IN THE LOS ANGELES REGION**

The City of Los Angeles LA Sanitation (LASAN) appreciates the opportunity to provide comments on the Los Angeles Regional Water Quality Control Board's (Regional Board) Notice of 2017-19 Triennial Review of Water Quality Standards in the Los Angeles Region. LASAN supports the Regional Board's efforts to continually review, update, and improve the Water Quality Control Plan for the Los Angeles Region (Basin Plan). As you are aware, LASAN currently operates four water reclamation plants across the City of Los Angeles (City) generating close to 100 million gallons per day (MGD). As the City embarks on expanding our efforts to maximize the use of recycled water, we believe partnering with the Regional Board and stakeholders is important to our success.

One of the next steps in the City's efforts to decrease our reliance on imported water is to increase opportunities to recharge local groundwater basins. In reviewing the Basin Plan we believe there is an opportunity for regulations to evolve in support of such efforts. Part of this evolution is providing regulatory structures that more accurately reflect the uses and characteristics of groundwater basins. Evaluation of groundwater basins should consider the basin as a whole and the potential impacts of recharged water evaluated within this broader context. Localized impacts could occur during recharge without impacting the overall water quality of the basin. The Basin Plan currently does not allow for those localized impacts when considering the overall mixing that occurs within the basin. The establishment of regulations in the Basin Plan that allows for consideration of mixing will support LASAN, the Regional Board and other stakeholders with the implementation of groundwater recharge projects. Similar efforts have been supported by other regions, such as the Lahontan Region, where an allowable and defined mixing zone can be established, and groundwater objectives can be exceeded so long as the mixing zone does not unreasonably affect the beneficial uses of the overall groundwater basin.

LASAN requests that the Regional Board consider evaluating the potential for including a groundwater mixing zone allowance in the Basin Plan as part of the 2017-19 Triennial Review Process.

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If you have any questions please contact Hassan Rad, Regulatory Affairs Division Manager at Hassan.Rad@lacity.org or at (213) 847-5186. We welcome the opportunity to discuss our comments and look forward to continuing our collaborative efforts.

Sincerely, -



ENRIQUE C. ZALDIVAR, Director  
LA Sanitation

ECZ:SK:JLC:HR:es

- c: Samuel Unger, Regional Water Quality Control Board
- Deborah J. Smith, Regional Water Quality Control Board
- Renee Purdy, Regional Water Quality Control Board
- Traci Minamide, LA Sanitation/EXEC
- Mas Dojiri, LA Sanitation/EXEC
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