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MEMBER AGENCY OF THE  
METROPOLITAN WATER  
DISTRICT  
OF SOUTHERN CALIFORNIA



October 21, 2016

The Honorable Felicia Marcus and  
Members of the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814

Electronic submission: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**RE: Comment Letter – Report to the Legislature on Feasibility  
of Developing Uniform Water Recycling Criteria for DPR**

Dear Chair Marcus and Members of the Board:

Las Virgenes Municipal Water District (LVMWD) appreciates the opportunity to comment on the draft report to the Legislature on the Feasibility of Developing Uniform Water Recycling Criteria for Direct Potable Reuse. Also, we recognize the diligent work of the State Water Resources Control Board and its staff to complete the work in collaboration with the Expert Panel and Advisory Group.

LVMWD was an early adopter of water recycling, serving its first customers in 1972. Over the years, we have expanded the use of recycled water in our service area, primarily for irrigation purposes, to meet 20 percent of overall demands. Moving forward, we expect potable reuse, including the possibility of direct potable reuse (DPR), to be an important component of our water supply portfolio. Currently, LVMWD and its Joint Powers Authority partner, Triunfo Sanitation District, are working together on a proposed surface water augmentation project, called *Pure Water Project Las Virgenes-Triunfo*, which will effectively eliminate discharges of treated effluent to Malibu Creek and create up to 5,000 acre-feet per year of new water supply for the region.

Overall, we support the finding that it is technically feasible to develop uniform water recycling criteria for DPR. Please consider the following comments when finalizing the draft report:

- Utilize a phased approach, as proposed, to develop uniform water recycling criteria for DPR, recognizing the different risk profiles for the three forms or types of DPR.

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- Develop consistent nomenclature for the different types of DPR, together with indirect potable reuse (IPR). We recommend an approach similar to that proposed by West Basin Municipal Water District: Groundwater Augmentation – IRP (full environmental buffer, greater than six months retention time); Surface Water Augmentation – IPR (two months or greater retention time); Source Water Augmentation (less than two months retention time); Direct Raw Water Potable Reuse (little retention time but additional polishing and commingling with other raw water sources upstream of a conventional water treatment plant); and Direct Distributed Potable Reuse (water delivered directly into a water distribution system, previously referred to as “flange-to-flange”).
- Begin development of uniform water recycling criteria for Source Water Augmentation and Direct Raw Water Potable Reuse in parallel with completion of the additional research required to fill knowledge gaps.

Thank you for considering our comments as you move forward with this important process to support the development of additional recycled water supplies to improve California’s water supply reliability and drought resilience.

Sincerely,



David W. Pedersen, P.E.  
General Manager

DWP:dpw