



# CVCWA Central Valley Clean Water Association

*Representing Over Fifty Wastewater Agencies*

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May 18, 2008

The Honorable John Laird  
State Capitol  
P.O. Box 942849  
Sacramento, CA 94249

RE: AB 2270 (Laird and Feuer) – Recycled Water Use

Dear Assemblyman Laird,

The Central Valley Clean Water Association (CVCWA) is writing in support of AB 2270 (Laird and Feuer) which will substantially assist California in meeting the statewide goal of recycling one million acre feet per year by 2010 and will give local agencies the ability to control salinity inputs including those from residential salt-based water softeners to protect the quality of the waters of the state. CVCWA is a non-profit organization consisting of 60 public agencies located within the Central Valley region that provide wastewater collection, treatment and water recycling services to millions of Central Valley residents and businesses.

AB 2270 addresses one of the greatest impediments to water recycling; controlling the discharge of salts into community wastewater sewer systems. These discharges increase the salinity in our treated effluent, which can constrain its use because of potential impacts to irrigated landscapes and high quality groundwater. CVCWA supports the enactment of legislation that removes obstacles in current laws limiting municipal government's ability to restrict the use of self-regenerating, salt-based water softeners. The ability to control residential salinity input is an important tool for the State or Regional Boards to protect water sources from unnecessary salt pollution and to encourage recycled water use.

Groundwater in the Central Valley is typically high in calcium and magnesium (i.e. hardness). When potable water supplies are high in hardness, many homeowners install self-regenerating water softeners to improve the taste of the water, to prevent carbonate deposits from forming on home appliances and glassware, and to improve the effectiveness of home laundering. The brine water used to regenerate self-regenerating ion exchange-type softeners contains high concentrations of salts, particularly chloride. This reject brine is typically discharged to the sewer system, thus increasing the dissolved salt loading to the wastewater treatment facilities. Dissolved salts are not removed through conventional wastewater treatment processes, although their concentrations in treatment plant effluents are typically restricted by effluent limits in discharge permits.

Current law places an inappropriate, heavy burden of proof on local agencies instead of encouraging source control activities, which prevent pollution, preserve water quality and enhance the state's water supply. It is difficult for wastewater agencies to enact regulations that restrict the installation of new water softeners and even more difficult to require the removal of existing self regenerating water softeners.

AB 2270 changes this burden of proof and appropriately recognizes the important role of the State and Regional Water Resources Control Boards in protecting water quality. The Bill authorizes the State Water Resources Control Board or a Regional Water Quality Control Board to make a finding that the control of residential salinity input will contribute to achievement of water quality objectives, and that any local agency that maintains a community sewer system in an area affected by the finding may enact an ordinance to control residential salinity inputs, including water softeners, to protect the quality of the waters of the State.

AB 2270 enhances the reliability of the State's water supply and provides local agencies with the authority they need to protect water quality. For these reasons, we support AB 2270.

Sincerely,

/s DYW

Debbie Webster, Executive Officer  
Central Valley Clean Water Association

c: Pamela Creedon – Central Valley RWQCB  
Tam Doduc – State Water Resources Control Board