



Sacramento Groundwater Authority
*Managing Groundwater Resources
 in Northern Sacramento County*

**Public Hearing (9/19/12)
 General Waste Discharge Requirements for ASR Projects
 Deadline: 9/13/12 by 12 noon**

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September 12, 2012



California American
 Water

Carmichael
 Water District

Citrus Heights
 Water District

City of Folsom

City of Sacramento

County of Sacramento

Del Paso Manor
 Water District

Fair Oaks Water District

Golden State
 Water Company

Natomas Central Mutual
 Water Company

Orange Yale
 Water Company

Rio Linda / Elverta
 Community Water
 District

Sacramento Suburban
 Water District

San Juan
 Water District

Agricultural and
 Self-Supplied
 Representative

Ms. Jeanine Townsend
 Clerk to the Board
 State Water Resources Control
 Board
 1011 I Street, 24th Floor
 Sacramento, CA 95814

Via E-mail
commentletters@waterboards.ca.gov

**Subject: Comment Letter – General Waste Discharge Requirements for ASR
 Projects**

Dear Ms. Townsend:

The Sacramento Groundwater Authority (SGA) strongly supports the State Water Resources Control Board's (SWRCB) adoption of a statewide general permit authorizing the injection of drinking water into groundwater storage as part of aquifer storage and recovery (ASR) projects.

SGA is a groundwater management agency formed in 1998 to sustain the groundwater resources in Sacramento County north of the American River. SGA is authorized by an agreement between the cities of Citrus Heights, Folsom, and Sacramento and the County of Sacramento to exercise their police power to protect the basin. One of SGA's primary goals to help ensure basin sustainability is to promote wet year banking, so that the basin can provide for users in dry periods. ASR is one of the potentially important future recharge tools in our region, given that Sacramento area surface geologic conditions and development patterns do not generally support direct surface recharge methods.

Additionally, ASR allows storage of wet-season water into groundwater storage via existing water distribution networks, which is key to ensure operational flexibility and long term water supply reliability. ASR is important because it has significantly lower capital costs compared to other types of storage projects by utilizing existing infrastructure within the local area. Local storage makes it more flexible and more responsive to local needs and contributes to the State's groundwater storage goals.

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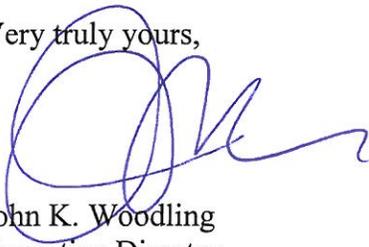
SGA appreciates the opportunity to comment on the general Waste Discharge Requirements. SGA has the following comment:

- The general Waste Discharge Requirements refers to the “source of injection water”, injectate, or injected(ion) water in several instances in the draft permit, Attachment A, and Attachment C. SGA hereby respectfully requests that clarification be made that the water used for injection into a groundwater basin meets California Department of Public Health’s (CDPH’s) drinking water standards for both primary and secondary maximum contaminant levels (MCLs) at the time of injection.

The injection of drinking water into groundwater storage has long been a water management tool available in other areas of the state. The draft ASR general permit that the SWRCB is now considering will make that tool available consistent in our State, where clean, reliable wet-season supplies are ideal for expanded conjunctive use. Accordingly, SGA urges the SWRCB to approve the draft ASR general permit.

Lastly, SGA applauds the assistance and hard work provided by Ms. Pamela Creedon and Mr. Rick Moss of the Central Valley Regional Water Quality Control Board. Ms. Creedon and Mr. Moss made this ASR general permit possible.

Very truly yours,



John K. Woodling
Executive Director