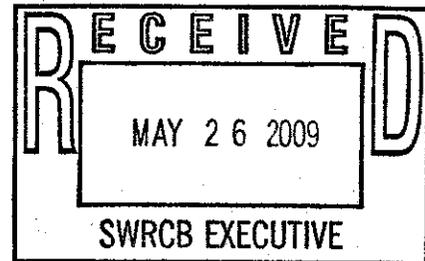




Environmental Utilities
Administration
2005 Hilltop Circle
Roseville, California 95747

May 26, 2009

Charles Hoppin, Chair, and Members
State Water Resource Control Board
1001 I Street
Sacramento, CA 95814



ATTN: Jeanine Townsend, Clerk to the Board
commentletters@waterboards.ca.gov

RE: City of Roseville Comments on Draft General Waste Discharge Requirements for Landscape Irrigation Uses of Municipal Recycled Water dated 05/07/2009 (General Permit)

Dear Chair Hoppin and Members of the Board:

The City of Roseville (City) appreciates the opportunity to provide comments on the *Draft General Waste Discharge Requirements for Landscape Irrigation Uses of Municipal Recycled Water* (Permit). Increased use of recycled water is critical to California's water supply future, and the Permit should facilitate and promote the benefits of using recycled water for landscape irrigation.

The City provided testimony regarding the 05/07/2009 draft of the Permit at the May 19, 2009 State Water Board Hearing. The following comments from the City of Roseville reflect that testimony and are directed specifically at the Monitoring and Reporting Program (MRP).

The City understands that monitoring and reporting are an appropriate result of permitting and regulation. However, the monitoring and reporting parameters and frequency proposed in the 05/07/2009 version of the MRP provide limited benefits.

Based on our review of the MRP, the following aspects of the monitoring and reporting requirements offer limited benefit and will result in the unintended consequence of impeding the expanded use of recycled water by a lack of interest to seek coverage under this General Permit:

- Volume of recycled water delivered to individual customers on a frequency more often than quarterly
 - The delivered volume of recycled water obtained from billing meters may not be available on a monthly basis and therefore could require an additional read for every site
- Nitrogen application rate
 - It is very difficult to know specific irrigation application rates for every use

area. Each use area will vary in soil and plant type requiring varying application rates even within the same use area.

- Monitoring use of fertilizers on every use area is too onerous. Every landscape type requires a different level of fertilizing. Tracking every use area is unrealistic.
- Volume of additional water
 - Accounting for rainfall or other sources of additional water is not feasible for service providers that cover large areas. Also, use areas with storage rarely have storage beyond 2 or three days irrigation demand. Therefore the metered demand will be representative of their use.

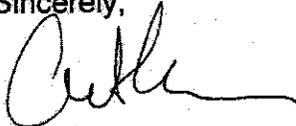
We urge you to consider the following monitoring and reporting requirements. These requirements are reasonable and useful and should not be too onerous for most recycled water administrators to collect and report.

- Volume (based on available meter data) of recycled water delivered to individual customers on a quarterly basis and reported annually
- Irrigated area of recycled water use areas (one time reporting unless there is a change)
- Total nitrogen content in recycled water delivered
- Site supervisors name and contact information for each use area
- A Best Management Practices (BMP) approach to address nitrogen in recycled water. A BMP is an effective method for addressing the nutrients in recycled water and its fertilizing effects. The BMP would provide site supervisors information and guidance on the nutrient content of recycled water at required site supervisor training.

The City supports the State Water Board's effort to streamline the process to permit landscape irrigation with recycled water projects. Landscape irrigation with recycled water is an effective way to reduce the demand for potable water. The City cannot support a permit that requires monitoring and reporting that is infeasible and of little benefit to public health. The MRP, as drafted in the May 7, 2009 version, will not facilitate the use of recycled water for landscape irrigation projects.

Thank you again for the opportunity to provide comments during this process.

Sincerely,



Art O'Brien
Wastewater Utility Manager
City of Roseville