

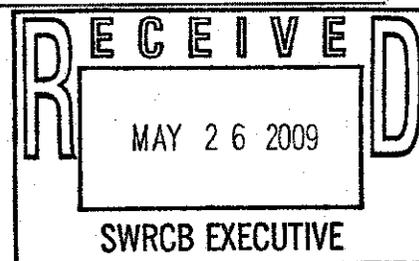


## California Association of Nurseries and Garden Centers

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May 26, 2009

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814



IN RE: Draft May 7, 2009 General Waste Discharge Requirements for Landscape Irrigation Uses of Municipal Recycled Water

Dear Board Members,

The California Association of Nurseries and Garden Centers appreciates the opportunity to provide comments on the May 7, 2009 General Waste Discharge Requirements for Landscape Irrigation Uses of Municipal Recycled Water.

**General Comment.** The Association strongly supports landscape irrigation use of municipal recycled water as an alternative to potable water supply irrigation in all commercial, industrial, governmental, and residential landscapes. We believe that provision for broader residential use of such recycled landscape irrigation would benefit the public and help conserve potable water supplies.

In addition, we note the following specifics:

1. On page 1, footnote 5, conflict exists between the statement here and item 3 at the top of page 12 as altered. As written all residential use is prohibited, without allowance for case-by-case exception.
2. On page 6, "Chlorine", the text fails to include beneficial soil biota among the cited organisms that may be killed due to residual levels of chlorine in recycled water. It specifies chlorine and fails to provide for other disinfecting agents (e.g. monochloramine,  $\text{NH}_2\text{Cl}$ ). These bacteria and more complex naturally occurring soil organisms are responsible for the digestion and reduction of organic matter into compost and component nutrients. They act as a natural limit on growth of populations of harmful soil pathogens and bacteria.

This impact is also omitted (along with the existing citations of fish and aquatic life) on page 16-17, item 5 (b). The Irrigation Management Plan should stipulate in item (ii) the presence and level of residual chlorine, monochloramine ( $\text{NH}_2\text{Cl}$ ), and other disinfecting agents that may be residual in municipal recycled water.

Respectfully submitted,

Robert J. Dolezal  
Executive Vice President  
CANGC