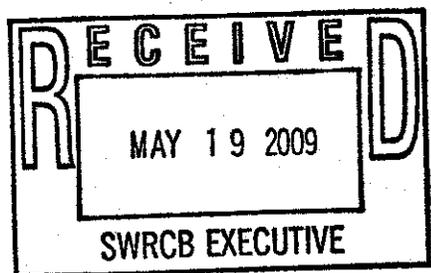




May 19, 2009



Technology in balance with nature

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Chair Charles R. Hoppin
State Water Control Board Members
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Sent via electronic mail to: commentletters@waterboards.ca.gov

- Board of Directors**
Representing:
- County of Sacramento
 - County of Yolo
 - City of Citrus Heights
 - City of Elk Grove
 - City of Folsom
 - City of Rancho Cordova
 - City of Sacramento
 - City of West Sacramento

Subject: Comment Letter – Landscape Irrigation Uses of Municipal Recycled Wastewater (General Permit) and a Mitigated Negative Declaration for the General Permit

The Sacramento Regional County Sanitation District (SRCSD) appreciates the opportunity to submit comments on the proposed State Water Resources Control Board's (Water Board) draft General Permit. We thank the Water Board and staff for revising the original draft general permit to address many of our concerns. We are particularly pleased that, consistent with the Recycled Water Policy, AB 1481 and other Water Code provisions, the revisions characterize recycled water as a valuable resource. The General Permit is on the right path—a path to increase recycled water use throughout California. With recurring drought, population growth, the Delta's collapse, and global climate change, the use of this valuable resource has never been more important to our state.

The SRCSD provides wastewater conveyance and treatment services to over 1.4 million people in the Sacramento region. In addition, the SRCSD owns and operates a 5-mgd Water Reclamation Facility that produces high-quality recycled water that is used by select customers in our region for non-potable purposes in-lieu of potable water. This recycled water is a new water supply that is safe to use, is drought-resistant, and helps to extend the local and State water supplies.

While we applaud your efforts, we urge you to consider some key issues as you move forward to adopt a sensible and workable general permit. We all want a general permit that results in the safe, reliable and increased use of recycled water in accordance with the law. We offer our comments in this spirit and hope to provide you meaningful insight based on our agency's experiences.

- Key to the general permit's success is that the permittees be producers and distributors—not users unless they also produce and distribute the resource. There are practical reasons for this. Producers and distributors are more familiar with the characteristics and regulation of recycled water, including any associated monitoring, reporting and enforcement. The users of recycle water are not always willing to use recycled water, and asking them to apply for individual permits may cause them not to consider the use of recycled water at all. They would question why they should seek a General Permit when they can use other sources of water for landscape irrigation and avoid additional requirements.

- Mary K. Snyder
District Engineer
- Stan R. Dean
Plant Manager
- Wendell H. Kido
District Manager
- Marcia Maurer
Chief Financial Officer

Chair Charles R. Hoppin and Board Members

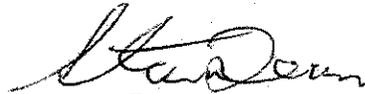
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- Also key to the general permit's success is an informative and workable monitoring and reporting program. The permit still contains prescriptive requirements regarding application of nutrients, and then onerous monitoring and reporting requirements to enforce the requirement. End use sites will be required to keep track of every bit of fertilizer applied, and to calculate the nutrient loading rate on a monthly basis. This is just not called for, and will serve as a deterrent for using recycled water. User reporting represents a shift in current practice and would deter recycled water use. The Board should replace the general permit's reporting requirements with those suggested on pages 17 and 18 of the April 27, 2009 comment letter submitted by CASA, WaterReuse and ACWA.
- The general permit should not include the new requirement that the California Department of Public Health approve use sites not included in the original Title 22 Engineering Report. Consistent with the Master Permit approach, the Administrator should have the authority to add new sites.

Thank you for the consideration of the SRSCD's comments. Please contact me for additional information at 916-875-9101.

Sincerely,



Stan R. Dean
District Manager

cc's: Ruben Robles, SRCSD
Terrie Mitchell, SRCSD
Jose Ramirez, SRCSD