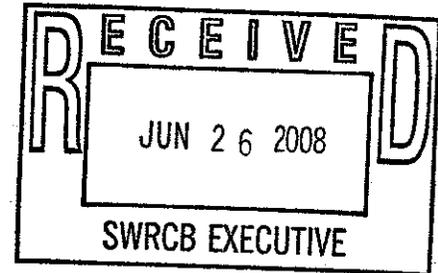


June 25, 2008

Tam Doduc, Chair and Members  
State Water Resource Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

Attn: Jeanine Townsend, Clerk to the Board  
([commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov))



**SUBJECT: Comments – Statewide General Permit for Landscape Irrigation with Recycled Water CEQA Scoping**

Dear Chair Doduc and Members of the Board:

The City of Roseville appreciates the opportunity to submit comments in response to the Board's scoping request under the California Environmental Quality Act (CEQA). The City of Roseville delivers disinfected tertiary treated Title 22 recycled water to 65 customers, including 4 golf courses and a power generation facility. Currently Roseville delivers approximately 3,000 acre-feet of recycled water per year. Roseville has produced disinfected tertiary recycled water for more than 20 years and has delivered it to customers for more than 10 years under a master reclamation permit issued by the Central Valley Regional Water Quality Control Board.

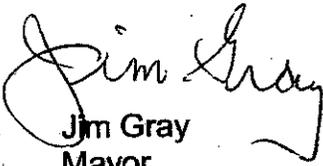
As a result of AB1481 (De La Torre), the Statewide General Permit for Landscape Irrigation with Recycled Water was to be created to provide a uniform interpretation of state standards regarding the use of recycle water for landscape irrigation. Additionally the intent of the General Permit was to simplify and expedite the permitting process in an effort to promote and expand the use of recycled water. In keeping with these goals for the General Permit, the City of Roseville offers the following comments regarding to the scope of the General Permit.

- Integration of the General Permit – clear boundaries between existing permits (such as a master Reclamation Permit or WRR's) and the General Permit are vital. The General Permit should start with Title 22 compliant recycled water. Then based on the level of treatment, provide permitting for landscape irrigation use. The General Permit should be an "opt in" permit allowing existing permit holders to continue under their current permits if they so choose.

- Best Management Practices (BMP's) – the intent of AB1481 would be best served by a General Permit based on BMP's. That is to say the General Permit should promote the use of BMP's to address issues such as watering at agronomic rates, nutrient application and incidental runoff.
- Incidental Runoff – incidental runoff is a reality of every type of irrigation regardless of source water. The General Permit should cover incidental runoff of recycled water by pushing it off to a MS4 Stormwater Permit. The scope of the General Permit should not include NPDES language for incidental runoff.
- Anti Degradation – As with irrigation with any quality of source water, anti-deg should be handled through BMP's. The General Permit should not require groundwater monitoring as a requirement of landscape irrigation projects. This type of requirement would be very onerous and would impede many existing and prospective projects.
- No Project Option – CEQA requires an analysis of a "no project option". A no project option could reduce potential recycled water projects and even affect existing projects. Reducing recycled water use could have long-term impacts on energy use. Recycled water use creates a net reduction in energy use by reducing the energy required to import and treat potable water. This reduction would have a positive impact on greenhouse gas production and thus global warming and cannot be ignored.

The City of Roseville applauds the Board's efforts to promote and expand recycled water use in the State. The City proposes creation of the General Permit through a stakeholder process working closely with current and potential recycled water purveyors, retailers, users and other interested parties.

Sincerely,

  
Jim Gray  
Mayor

cc: Senator Dave Cox  
Assembly Member Ted Gaines