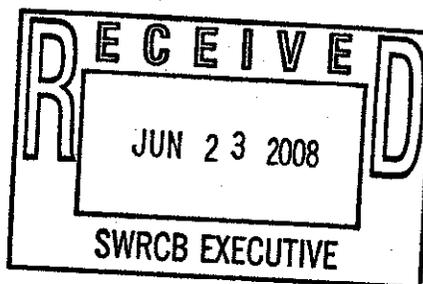




June 23, 2008



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

Subject: Comment Letter – Statewide General Permit for Landscape Irrigation Uses of Recycled Water and Associated Environmental Document

Dear Ms. Townsend:

Thank you for the opportunity to provide input on the scope and content of the State Water Resources Control Board (State Water Board) Statewide General Permit (General Permit) for Landscape Irrigation Uses of Recycled Water and associated environmental document. The Santa Clara Valley Water District (SCVWD) offers the following comments for your consideration:

The Santa Clara Valley Water District serves the nearly 1.8 million residents of Santa Clara County. Ensuring a safe, reliable supply of high-quality water now and in the future is a top priority for the SCVWD. Our core business includes management of groundwater resources, flood protection and stream stewardship, and wholesale water supply. SCVWD objectives include both promoting recycling and protecting groundwater resources, as is evident by the following SCVWD Board of Directors Ends Policies:

- E-2.1.6. The groundwater basins are aggressively protected from contamination and the threat of contamination.
- E-2.1.7. Water recycling is expanded within Santa Clara County in partnership with the community, consistent with the District's Integrated Water Resources Plan (IWRP), reflecting its comparative cost assessments and other Board Policies.
 - E-2.1.7.1 Target 2010, water recycling accounts for five percent of total water use in Santa Clara County.
 - E-2.1.7.2 Target 2020, water recycling accounts for ten percent of total water use in Santa Clara County.

To meet the needs of the community, the SCVWD looks for flexible and adaptive ways to balance competing objectives. As our community depends on groundwater for nearly half of the water used annually in Santa Clara County, sustaining and protecting groundwater supplies is a key SCVWD mission. SCVWD also recognizes the value and importance of expanding recycled water use as a critical component for ensuring future water supply reliability.

Depending on the degree of treatment of the recycled water and the underlying groundwater quality, recycled water has the potential to degrade groundwater quality. SCVWD is a strong advocate for the appropriate expansion of recycled water and we believe this expansion can and must be accomplished without sacrificing groundwater quality.

SCVWD recommends the State Water Board take the following actions during development of a statewide General Permit and associated environmental document:

1) Evaluate Potential Water Quality Impacts in Accordance with Anti-Degradation Policy

In some cases, concentrations of anthropogenic compounds and salts found in recycled water are significantly higher than those in groundwater or streams. Emerging contaminants not found in groundwater or surface water may also be present in recycled water. The State Water Board should carefully consider these potential impacts to both surface water and groundwater quality during development of a statewide general permit and associated environmental document.

The use of recycled water must be balanced with potential impacts to other resources in accordance with the State Water Board's anti-degradation policy. The SCVWD fully supports the State's anti-degradation policy and recognizes that sometimes it is in the best interest of the people of the State to allow degradation to occur. However, in high-quality groundwater basins, allowing degradation may not achieve the maximum benefit. Santa Clara County relies on high-quality groundwater for municipal, industrial, and agricultural uses. Communities in the southern portion of the county are completely reliant on groundwater as the sole drinking water source. The SCVWD believes the expanded use of recycled water must be balanced with the need to protect the quality of local groundwater, particularly in high-use, high-quality groundwater basins such as those in Santa Clara County. In some cases, this may require additional permit conditions such as irrigation BMPs to ensure infiltration is minimized or improved recycled water quality through additional treatment.

2) Protect Sensitive Groundwater Areas

The SCVWD encourages the expanded use of recycled water in geologic areas where significant clay layers and adequate vertical separation to groundwater protect high-quality groundwater. In areas where groundwater is highly sensitive due to minimal separation to groundwater or very permeable soils, the SCVWD is working with recycled water producers to improve recycled water quality to protect groundwater quality. As additional mitigation may be required to protect sensitive groundwater areas, the SCVWD recommends that groundwater recharge zones and wellhead protection areas (as defined by local groundwater management agencies or water purveyors) be excluded from eligibility under the General Permit. In recognition of the need to protect these sensitive areas, San Francisco Bay Regional Water Quality Control Board Order 96-011 (General Water Reuse Requirements for Municipal Wastewater and Water Agencies) contains a provision to prohibit the application of recycled water in these areas.

3) Hold Facilitated Workshops to Consider Stakeholder Concerns

In light of our shared responsibility to protect water resources, the SCVWD recommends that the State Water Board hold facilitated stakeholder workshops to consider comments from Regional Water Boards, groundwater management agencies, and water replenishment districts. These workshops will facilitate an improved understanding of stakeholder interests and may help to ensure General Permit requirements do not conflict with local groundwater management plans or groundwater protection strategies.

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Thank you for the opportunity to provide input on the scope and content of a statewide General Permit for landscape irrigation uses of recycled water and the associated environmental document. If you have any questions on the SCVWD comments, please contact me at (408) 265-2607, extension 2080.

Sincerely,



Keith Whitman
Deputy Operating Officer
Water Supply Management Division

cc: B. Ahmadi, H. Ashktorab, J. Maclay, G. Zlotnick, P. John, V. De La Piedra, B. Judd

vjd