



# California Regional Water Quality Control Board

## Los Angeles Region



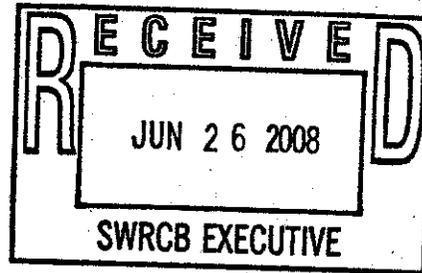
Linda S. Adams  
Cal/EPA Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger  
Governor

June 26, 2008

Ms. Tam Doduc, Chair  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814



Public Workshop  
Landscape Irrigation  
Deadline: 6/26/08 by 12 p.m.

Attention: Jeanine Townsend, Clerk to the Board

### COMMENT LETTER – LANDSCAPE IRRIGATION GENERAL PERMIT

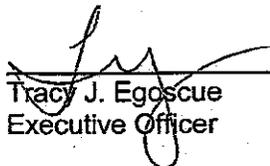
The Los Angeles Regional Water Quality Control Board appreciates the opportunity to comment on the Scoping Meeting for a Statewide General Permit for Landscape Irrigation Uses of Recycled Water, held by the State Water Resources Control Board on June 18, 2008. We generally support the concept of having a Statewide General Permit for Landscape Irrigation Uses of Recycled Water. However, there are two important issues that we would like to see addressed during the CEQA process:

**Cumulative Impacts** – The CEQA documentation should address the cumulative impacts of salt loading, both in surface and groundwater, as a result of the application of recycled water used for irrigation. The documentation should take into account all major sources of salts that can contribute to loading, such as accumulation from agricultural practices, use of imported potable water, overdraft of groundwater, etc.

**Assimilative Capacity and Antidegradation** – The CEQA documentation should address how State Water Resources Control Board Resolution 68-16, the Antidegradation Policy, will be implemented for groundwater basins that have existing assimilative capacity.

In conclusion, while Los Angeles Regional Water Quality Control Board supports streamlining permits for recycled water used for irrigation to encourage use, the permit should in no way relax regulation to the point where groundwater and surface waters will be degraded, including assimilative capacity, where high quality waters exist. Should you have any questions, please contact Don Tsai at (213) 576-6665.

Sincerely,

  
Tracy J. Egoscue  
Executive Officer

cc: Mike Levy, State Water Resources Control Board, Office of the Chief Counsel

*California Environmental Protection Agency*



*Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.*