



Established in 1918 as a public agency  
**Coachella Valley Water District**

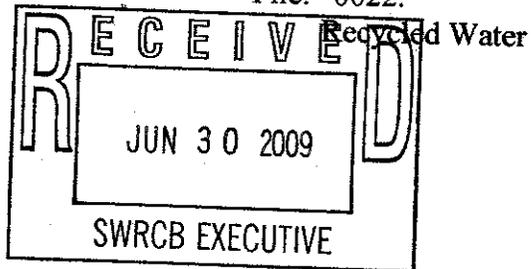
Directors:  
Patricia A. Larson, President  
Peter Nelson, Vice President  
Tellis Codekas  
John W. McFadden  
Russell Kitahara

Officers:  
Steven B. Robbins, General Manager-Chief Engineer  
Julia Fernandez, Secretary  
Dan Parks, Asst. General Manager  
Redwine and Sherrill, Attorneys

June 30, 2009

File: 0022.

Tam Dudoc, Chair, and Members  
Attention: Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814



Dear Chair Dudoc and members of the Board:

Subject: Comment Letter - Landscape Irrigation General Permit

The Coachella Valley Water District (CVWD) appreciates the opportunity to comment on the draft subject general permit for landscape irrigation uses of municipal recycled water. CVWD provides domestic water, wastewater, recycled water, irrigation/drainage and regional stormwater protection services to a population of 265,000 throughout the Coachella Valley in Southern California. CVWD has also taken a lead role in groundwater management in the Coachella Valley by importing surface water for groundwater replenishment, encouraging water conservation and developing in-lieu groundwater recharge projects that depend on alternative non-potable water supplies that include recycled water.

We appreciate your staff's work to address some of the problems that have been identified with the subject permit. While many of the proposed revisions are an improvement, this permit still includes provisions identified in our previous comments to your office that would discourage recycled water use if required in the Colorado River Basin. Several recent revisions raise additional concerns that are summarized in the enclosed comments. Your consideration of these comments is appreciated.

If you have any questions, please call me at extension 2286.

Yours very truly,

Steve Bigley  
Environmental Services Manager

Enclosure/1/as

cc: Dave Bolland (with enclosure)  
Association of California Water Agencies  
910 K Street, Suite 100  
Sacramento, CA 95814

SB:md:eng:wr:09:june:Dudoc-swrcb

Coachella Valley Water District Comments  
Draft General Waste Discharge Requirements For  
Landscape Irrigation Uses of Municipal Recycled Water (General Permit)  
June 30, 2009

1. General Comment. Coachella Valley Water District (CVWD) supports the comments included in the joint letter dated June 30, 2009, from California Association of Sanitation Agencies (CASA), WaterReuse Association and the Association of California Water Agencies (ACWA). These comments address previously identified problems with the subject permit including concerns related to recycled water application times, contact with workers, facility marking and separation, signage and overspray that need to be revised before adopting the subject permit.
  
2. Finding 41. Item (e) of this finding states, "To comply with this General Permit, Producers, and Distributors must implement (and ensure Users implement) the following treatment and control measures necessary to avoid pollution or nuisance and maintain the highest water quality consistent with the maximum benefit to the people of the state: ... (e) Employ trained personnel (e.g., Recycled Water Use Supervisor)." It is not reasonable to require Producers and Distributors to employ Recycled Water Use Supervisors or any other personnel operating recycled water irrigation facilities at Use sites. Please revise this finding to either replace the word "Employ" with the word "Designate" or clarify that Users are responsible for employing trained personnel (e.g. Recycled Water Use Supervisor) to operate recycled water irrigation facilities at Use sites.
  
3. Monitoring and Reporting Program Table. The text preceding this table should clearly state that the Administrator is only responsible for reporting monitoring for recycled water projects within their recycled water service area. This is important because some Administrators, like CVWD, provide multiple services that have different service areas. The parameter "Total number of use areas/basin" listed in this table should include a footnote that clearly states this parameter represents the total number of Use sites within the Administrator's recycled water service area located within each basin /subbasin.