

MONTEREY COUNTY



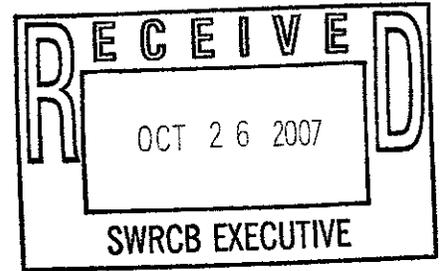
Water Quality & Operations Committee

The production of clean and safe water for agriculture

12/4/07 Bd. Mtg.
Water Recycling Policy
Deadline: 10/26/07 Noon

October 19, 2007

Ms. Jeanine Townsend
Acting Clerk to the Board, Executive Office
State Water Resources Control Board
P.O. Box 100
Sacramento, California 95812-0100



Subject: Comment Letter – Proposed Water Recycling Policy

Ms. Townsend:

I write to comment on the SWRCB proposed Water Recycling Policy on behalf of The Monterey County Recycled Water Projects' "Water Quality and Operations Committee". The Water Quality and Operations committee is comprised of growers, Monterey County Water Resources Agency staff, Monterey County Environmental Health Staff, and Monterey Regional Water Pollution Control Agency Staff. Our committee gives direction to the County and Regional Pollution Control Agency as to how the project(s) are operated to protect the long term viability of agriculture in North Monterey County.

The Monterey County Recycled Water Project(s) serve 12,000 acres of prime irrigated Ag lands in North Monterey County. This recycled water has been used to irrigate edible vegetable crops (including lettuce, artichokes, and strawberries) since 1998. Over the past 7 years we have closely monitored salt levels in our soils as compared to adjacent lands irrigated with well water. We have seen salt levels increase in our soils; and then reach an equilibrium level that parallels the salt levels in the comparison soils irrigated with well water. We have not seen a detrimental effect on our crops. In fact, salt sensitive crops such as strawberries have increased in acreage since the projects came on line.

We are aware of the salt issues with our water and discuss salt issues monthly. Our source waters come from different cities with different water qualities. As growers of high value crops, it is imperative that we do everything we can to maintain the quality of our irrigation water.

We recommend to the State Water Resources Control Board the following points:

1. The AG water discharge requirements imposed on the growers that use recycled water should be no more stringent than the salt levels

Date Hass, Chair

Members:

Monterey County

Environmental Health

Monterey County Water

Resources Agency

Monterey Regional Water

Pollution Control Agency

Growers of Monterey

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2. in the recycled water received. To ask the grower that irrigates with recycled water to "clean up" the recycled water is to impose an undue hardship on the user of the water, and would discourage its use.
3. If the groundwater in the area of the recycled water use is of poorer quality than the recycled water, then the Ag discharge requirements should reflect the difference. Users of recycled water should not be asked to change their practices if their use of recycled water actually benefits the surrounding environment by affecting it less than the alternative waters (like well water) that might be used in irrigation.
4. Since recycled waters can contain high levels of nitrogen in different forms, the use of recycled water should be encouraged as a means to moderate the discharge of N to surrounding waters and underground basins either directly or as leachate. Current Ag discharge requirements imposed on agricultural users of irrigation waters address salt discharges and growers are required to monitor their discharges to minimize the impacts of their operations to the surrounding environs.
5. The establishment of mandatory TMDL's of the users of recycled waters have to be carefully constructed to reflect the actual recycled water that is received and used by the grower. If the source water(s) contain high levels of a certain element or molecule, then the users of the recycled water should be held to a standard no harsher than the level the recycled final product water contains. Imposing standards on the users of the recycled water that require the user to make the water "better" is to penalize to user and dissuade the use of the recycled water.

We appreciate the opportunity to comment on this very important matter. We believe that our recycled water is one of the safest sources of irrigation water in the world and we are proud of our recycled water projects in Monterey County.

Sincerely,



Dale Huss

Chair - Water Quality and Ops Committee