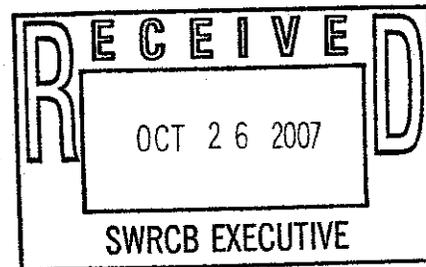


October 26, 2007

Jeanine Townsend, Acting Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814



Sent by Email: commentletters@waterboards.ca.gov
and by: Fax: (916) 341-5620
(Original Signed Document on file and available upon request)

Reference: **Draft Water Recycling Policy**

Dear Ms. Townsend:

The North San Mateo County Sanitation District (NSMCSD) a subsidiary of the City of Daly City appreciates the opportunity to comment on the Draft Water Recycling Policy (Policy). The NSMCSD is a local government agency, serving approximately 120,000 municipal wastewater treatment customers. The NSMCSD is governed by elected officials and managed by professionals who are dedicated to protecting our water environment and the public health.

The NSMCSD owns and operates a recycled water facility that is permitted to distribute 2.77 mgd of disinfected tertiary treated recycled water. Currently, the NSMCSD's recycled water is used for landscape irrigation at three premier golf courses, Olympic Club, San Francisco Golf Club and Lake Merced Golf Club, City athletic fields and median strips along John Daly Boulevard and Junipero Serra Boulevard. At this time non-irrigated uses (toilets and cooling towers) are being evaluated, although the Policy doesn't appear to address this type of use.

The City of Daly City also partially depends on local groundwater to supply the City's water demands. We support locally driven basin-wide planning for management and sustainable use of groundwater as the correct and appropriate way to preserve groundwater quality. The proposed Policy is overly prescriptive in some instances and vague in other respects.

The NSMCSD's Recycled Water Program is regulated by Title 22 and the San Francisco Regional Water Quality Control Boards Order 96-011. This is Region 2's General Water Reuse Requirements that includes the order, self monitoring requirements and standard provisions, and reporting requirements.

Nevertheless, the NSMCSD supports the idea of a statewide policy that would apply consistent and realistic criteria that facilitates the use of recycled water and therefore agrees with, and supports, comments submitted by the WaterReuse Association and the California Association of Sanitation Agencies (CASA).

In addition, the NSMCSD offers the following comments as well:

Nutrient Management Plan

- Should be deleted. Emphasis should be on best management practices.
- Regardless, a guidance document provided by the SWRCB should be developed prior to the adoption of a policy.
- We would expect to have opportunity to review any guidance document and mutually agree with what the State would be expecting as part of a nutrient management plan.
- Still, it is not appropriate or necessary to require a nutrient management plan for all recycled water irrigation projects.
- The requirement to control salt discharges to collection systems from industrial facilities and self regenerating water softeners puts an undue hardship on the recycled water producer, and provides questionable, at best, benefits.

Distribution Uniformity:

- This should be determined prior to the adoption of the policy.
- It is not appropriate to regulate the amount of recycled water applied to an irrigation site. End users typically dictate demand and existing contract language is an "as requested" delivery schedule.
- It is unclear at this time who would determine "appropriate" application rates as there are various schools of thought on this subject.

TDS Concentration:

- The monthly TDS concentration of 300 plus source water concentration is unrealistic for many dischargers.
- Source water TDS cannot be controlled by the recycled water producer because it is too variable and therefore should not be used.
- 700-1,000 TDS is pretty typical of recycled water so this is the range that should be considered.
- NSMCSDs' current recycled water use agreements with the golf courses require TDS to be 700 mg/L or less. Golf course landscape is particularly sensitive to salts. Technical foundations upon which the value was based — taking into account climate, soils and plant materials at the three golf courses — are contained cumulatively in the references cited below:
 - Harivandi, Ali, "Waste-water Quality and Treatment Plants", in The United States Golf Association. Wastewater Reuse for Golf Course Irrigation. 1995.
 - Throssell, Clark S. and David M. Kopec, "Irrigation Water Quality" presented by Golf Course Superintendents Association of America, 1995-1996.
 - Food and Agriculture Organization of the United Nations Irrigation and Drainage Paper 29, Revised, 1985.
- The policy effectively has the recycled water producer reacting to data (monthly average is based on average results on data collected in the past 30 days) that may or may not reflect current operation.

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Financial Liability:

- We are concerned with the breadth of the provisions. The policy should explicitly state that it does not alter liability under existing law.
- It is not clear if this provision is intended for projects that are something other than groundwater reuse projects.

Financial Means Test:

- The financial means test is vague and regardless should be deleted from the policy.

While NSMCSD supports the Board's decision to develop a policy there is still too much ambiguity and/or certainty associated with the language in the policy that must be resolved before adoption takes place. We ask that additional stakeholder workshops be conducted throughout the State to help in resolving issues. In that spirit, we look forward to working with the SWRCB to help with the development of final Policy Language and procedures. If you have any questions feel free to contact me at (650) 991-8200 or by email at psweetland@dalycity.org or Cynthia Royer at croyer@dalycity.org

Sincerely,

Patrick Sweetland
Director of Water and Wastewater Resources

PS:cr/jg[L07-237]