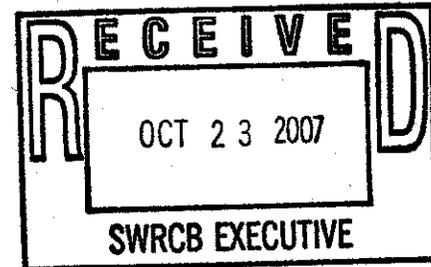


Directors:
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 Doug A. York, *Director*
 General Manager:
 Rex Sharp

October 23, 2007

Jeanie Townsend
 Acting Clerk to the Board
 Executive Office
 State Water Resources Control Board
 Fax: (916) 341-5620



Subject: Comment Letter – Proposed Water Recycling Policy

Dear Ms. Townsend:

The Draft Water Recycling Policy proposes that the monthly average total dissolved solids (TDS) concentration in recycled water not exceed the monthly average TDS concentration of the source water supply plus 300 mg/L. My concern with this approach is as follows:

Applying a 300 mg/L TDS concentration limit on recycled water above source water TDS throughout the state will not always "encourage and broaden its usage" as is one of the stated intents of the Policy nor would it provide the best protection of groundwater against elevated TDS. As an example, in our service area there are two sources of water. One source is well water from relatively deep wells and the second source is Colorado River water available from a canal system. The domestic supply is almost exclusively well water generally having a TDS concentration of less than 200 mg/L. The well water is also the "source water" for our effluent. The TDS concentration of our treatment plant effluent is generally, but not always, below 500 mg/L and within the proposed TDS concentration limit. The canal water from the Colorado River available for irrigation in our area shows annual TDS concentrations, measured at Imperial Dam, ranging from 612 mg/L to 896 mg/L from 1970 to 2004 (USGS Quality of Water, Colorado River Basin, Progress Report No. 22, 2005). Therefore, under the proposed Policy, if our effluent exceeds 500 mg/L TDS it could not be used for irrigation. Yet it would be acceptable to irrigate with Colorado River water, with an even higher TDS concentration, resulting in a net increase in TDS applied over the groundwater basin. This situation would not achieve the objectives of the proposed Policy.

Thank you for the opportunity to comment on the draft Policy.

Sincerely,

Rex Sharp
 General Manager