

TERESA JORDAN
3152 SHAD COURT
SIMI VALLEY, CA 93063
TELEPHONE NO. (805) 522-5016

TO: Jeanine Townsend, Acting Clerk ^{to the} Board
State Water Resources Control Board
1001 I Street, 24th
Sacramento, CA 95814

FAX NO.: (916) 341-5621

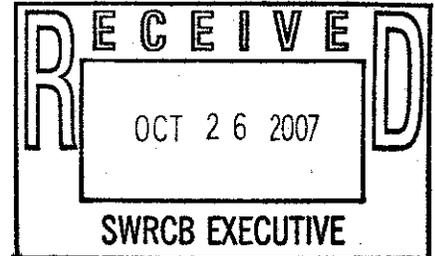
DATE: October 26, 2007

NO. OF PAGES: 5 (includes cover sheet)

RE: "Comment Letter - Water Recycling
Policy."

3152 Shad Court
Simi Valley, CA 93063
October 26, 2007 ^{12/4/07 Bd. Mtg.}
Water Recycling Policy
Deadline: 10/26/07 Noon

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



Re: "Comment Letter - Water Recycling Policy."

Dear Members of the Board:

I am writing to voice my support for the establishment of a Water Recycling Policy in order to have consistency and uniformity, and to convey my concerns on points made in the Proposed Policy, and the "Draft Staff Report and Certified Regulatory Program Environmental Analysis".

PROPOSED POLICY

#1 - Does not address impoundments that store recycled water. Keeping in mind the Boeing Company's Santa Susana Field Laboratory related many water quality violations, the City of Simi Valley delaying tactics instead of complying with the Municipal NPDES Permit requirements, and the City of Simi Valley (Waterworks District No. 8) and the Calleguas Municipal Water District Joint Well Water Project, as well as the Ventura Countywide MS4 Permit it is imperative that the State Water Board develops uniform statewide requirements for impoundments. I have no confidence in the Regional Water Boards development of requirements for impoundments on a case-by-case basis process due to the fact that:

- a. Basin Plans are out of date with respect to control of salts, and don't describe how groundwater objectives will be achieved,
- b. Some Regional Water Boards regulate agricultural operations under conditional

waivers that focus on surface water discharges,

- c. Regional Water Boards have established varying requirements for recycled water used for irrigation,
- d. Some Regional Water Boards have established limitations for salts in recycled water and other have not,
- e. Some Regional Water Boards water recycling irrigation projects have groundwater monitoring requirements, but most do not".
- f. Regional Water Boards have interpreted differently Resolution No. 68-16's "maximum benefit to the people of the state" term, and the "best practicable treatment or control".

#2 - Does not address incidental runoff of recycled water. As Comment #1 illustrates at least in the Ventura County area, the process of interpreting federal National Pollutant Discharge Elimination System (NPDES) regulations has created a state of non-compliance. If staff's recommendation to address incidental runoff of recycled water in a different process, then have it be through the development of a statewide general NPDES permit for discharge of incidental runoff of recycled water, but also ensure that public hearings are scheduled at every level of local government, and before the State and Regional Water Boards in order to ensure that the Public Participation Process is not violated.

#3 - With regards to "Salts", Page 3 of the "Draft Staff Report...", I prefer Alternative "a)" since Alternative "d)" (preferred by staff) while \ effluent limitations are established the salinity will be allowed to be increased. This decision was heart wrenching. I would have preferred to have the establishment of recycled water limitations for salts' concentrations, and effluent limitations; not one or the other.

- #4 - I agree with the requirement to limit the amount of recycled water applied so that it does not exceed the amount needed for landscapes or crops.
- #5 - There is a conflict in the Proposed Policy with regards to groundwater monitoring.
- #6 - I agree with the requirement for the development and implementation of nutrient management plans.
- #7 - I agree with the requirement that recycled water shall not cause or contribute to a violation of a water quality objective.
- #8 - Page 8, "Draft Staff Report...", with regards to Groundwater Recharge Reuse Projects, I agree with "a)", have concerns with "b)", "c)", and "d)", and am not completely clear about "e)" because non-compliance could be the end result if the use of conflict resolution is abused.
- #9 - I agree with the Financial Assurance/Liability requirement since dischargers are not exempt from liability for contamination of groundwater.

ENVIRONMENTAL ANALYSIS (CHECKLIST)

- #1 - Though staff has checked off the "No Impact" boxes for Air Quality, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Mineral Resources, Public Services, Recreation, and Transportation/Circulation, the statement to the effect that "Our lack of awareness, however, does not preclude the possibility of recreational uses that could be impacted by construction activities in response to this proposed Policy" is made. Having the future activity subject to CEQA, though, does not guarantee that potential impacts will be fully evaluated, or even evaluated, for these issues because of the "Statement of Overriding Considerations" tool.

Members of the Board, the State should address its limited water supply with a recycled water policy, but it

must also implement water conservation policies that are in place for the long-term in order for the people to make it through drought, natural and man-made disasters that may impact the water supply systems, and population growth. We cannot afford to live willy-nilly anymore if we are to preserve and protect our quality of life in California. Farmers must not be made the scapegoat in our State's water crisis.

Members of the Board, I was surprised to learn from the "Draft Staff Report..."--Page 2, second paragraph, last sentence--that "Recycled water is also a source of salt."

Members of the Board, I agree that water supply planning must be integrated with water quality planning.

Members of the Board, I am opposed to the Toilet-to-Tap water supply concept. There are problems inherent with cross-contamination with the pipeline systems, most especially in new housing developments.

Members of the Board, I have concerns regarding the use of recycled water for agricultural irrigation. I am not completely convinced that the supply is clear of all toxic contaminants.

Members of the Board, are you able to ensure that local governments respond to comments submitted by the public for public review and comment period documents? The City of Simi Valley, and the County of Ventura don't respond to me, thus are in violation of my Public Participation Process rights. I will not be made a party to ill-advised, and ill-conceived actions and decisions.

Sincerely,



Mrs. Teresa Jordan

Fax Call Report

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SWRCB
916-341-5621
2007-Oct-26 11:11 AM

Job	Date/Time	Type	Identification	Duration	Pages	Result
771	2007-Oct-26 11:08 AM	Receive		2:30	5	Success
	OCT-26-2007 11:15 AM					P.01



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