

**Sacramento Regional County Sanitation District****(SRCSD)****FAX***Mary K. Snyder, District Engineer**Stan R. Dean, Plant Manager**Wendell H. Kido, District Manager**Marcia Maurer, Chief Financial Officer**Claudia Goss, Communication and Media Officer*

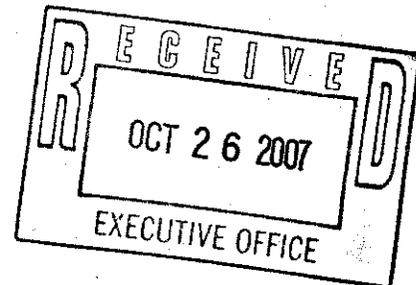
**TO: Jeanine Townsend, Acting Clerk to the Board  
State Water Resources Control Board**

**FAX: 341-5621**

**FROM: Wendell Kido, District Manager**

**FAX: 876-6160**

**SUBJ: Comment Letter – Water Recycling Policy**





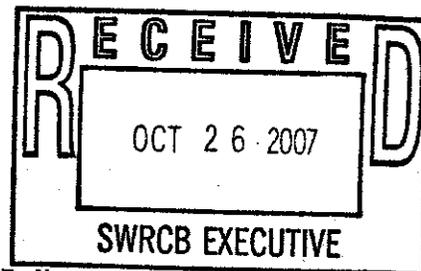
Wastewater Treatment

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

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October 26, 2007

Chair, Tam Doduc and Members  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814-2403



SUBJECT: Comment Letter: Water Recycling Policy

Board of Directors  
Representing:

- County of Sacramento
- County of Yolo
- City of Citrus Heights
- City of Elk Grove
- City of Folsom
- City of Rancho Cordova
- City of Sacramento
- City of West Sacramento

Dear Chair Doduc and Members of the Board:

The Sacramento Regional County Sanitation District (SRCS D) is pleased to submit comments on the State Water Board's draft Water Recycling Policy. We appreciate the State Water Board's efforts in undertaking this policy and offer our comments in the spirit of assisting the Board in achieving its goals to facilitate recycled water use and improve consistency in the permitting process.

The SRCS D provides wastewater conveyance and treatment to over 1.3 million people in the Sacramento region. In addition, we are doing our part to help the environment and extend local water supplies by recycling wastewater for landscape irrigation. As you know, recycled water is the only growing water supply in California and is a vital resource for the State's economy. The Legislature recognizes the value of recycled water and has established a statewide goal of using 1,000,000 acre-feet of this clean, safe supply by the year 2010.

The California Section of the WaterReuse Association has provided a comprehensive list of comments on the Water Recycling Policy (Policy) so they will not be repeated here. We fully support the WaterReuse comments and would like to highlight some of the important issues:

- It is imperative that the Board consistently view recycled water as a valuable resource rather than a waste discharge.
- The SRCS D supports the Board's decision to address recycled water anti-degradation issues in the Policy in order to facilitate project permitting. We do not believe that anti-degradation approaches designed to address waste discharges to surface water or land are appropriate for irrigation projects that comply with Title 22 and result in only incidental amounts of water reaching groundwater.
- In general, the Policy strikes the proper balance with regard to reliance on the California Department of Public Health with regard to human health protection.
- We support the Board's general approach to the regulation of salts and nutrients as outlined in the Policy. We appreciate the emphasis on basin-wide planning and understand the desire to establish a performance based limit on salts in recycled water to ensure that projects can go forward without significantly increasing salt levels in

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Tam Doduc and Members

October 26, 2007

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- the interim. But, the establishment of a 300 mg/l increment for TDS will require the SRCSD recycled water program to shut down. The SRCSD has invested tens of millions of dollars in recycled water infrastructure which under this policy could not be used. The SRCSD believes that a TDS increment of 550 mg/l is protective of the environment and would still allow use of recycled water in the region.
- The staff report states that the Board does not intend to address incidental runoff in this Policy. The SRCSD encourages the Board to address reasonable regulation of incidental runoff of recycled water, to the maximum extent possible within existing regulatory schemes. We are concerned that if the Policy does not address incidental runoff in some manner, we will continue to lack clear guidance on the appropriate regulatory scheme for irrigation runoff that happens to be recycled water.
- The Policy should clearly delineate those requirements that apply to irrigation and those that apply to recharge. A requirement such as groundwater monitoring that is appropriate for groundwater recharge, which involves intentionally adding large amounts of water to an aquifer, is neither necessary nor practical for an irrigation project.

In closing, we wish to emphasize our appreciation for the State Water Board's commitment to the State's water recycling goals, and to express our support for the overall tenor and approach set forth in the Policy. We believe that with the SRCSD & the WaterReuse Association suggested language changes, the adoption of this Policy will be a tremendous step toward increasing predictability and consistency in the permitting process and increasing California's use of this sustainable and safe water supply.

Sincerely,



Wendell H. Kido  
District Manager

## Fax Call Report

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SWRCB  
916-341-5621  
2007-Oct-26 09:20 AM

Job	Date/Time	Type	Identification	Duration	Pages	Result
768	2007-Oct-26 09:19 AM	Receive	916 876 6160	1:06	3	Success
	WQ ADMINISTRATION	Fax:916-876-6160		Oct 26 2007 10:16	P.01	

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