



Scotts Valley Water District

P.O. BOX 660006 • SCOTTS VALLEY, CA 95067-0006

(831) 438-2363 • FAX (831) 438-6235

EMAIL: contact@svwd.org

Office Address:
2 CIVIC CENTER DR.
SCOTTS VALLEY, CA 95066

Board of Directors:

MARGO HOBER
President

CHRIS PERRI
Vice President

WILLIAM KASSIS
Director

KEN KANNEGAARD
Director

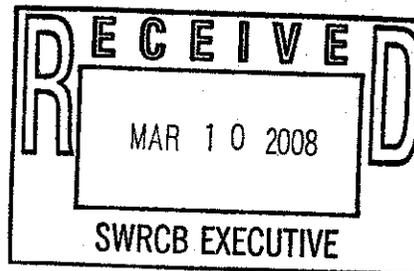
DAVID T. HODGIN
Director

CHARLES McNIESH
General Manager

VIA U.S. MAIL AND FACSIMILE (916) 341-5620

March 10, 2008

Tam M. Doduc, Chair, and Board Members
State Water Resources Control Board
P.O. Box 100
Sacramento, California 95812—0100



SUBJECT: COMMENT LETTER: PROPOSED RECYCLED WATER POLICY

Dear Chair Doduc and Members of the Board:

Scotts Valley Water District requests that the State Water Resources Control Board defer action scheduled for March 18, 2008, on a proposed Recycled Water Policy resolution. We are very supportive the stated goal of removing barriers to use of recycled water, but we are concerned that a number of specific provisions within the new Policy may have the opposite effect. We speak from the perspective of a small water district with limited resources struggling to expand our existing recycled water program to reach new customers. We can ill afford new obstacles.

We are aware that the current proposed Policy incorporates a number of improvements over earlier drafts, but unfortunately, from our perspective, a number of potentially serious problems remain. We are particularly concerned that we may face new impediments, or perpetuation of existing impediments, arising from language in the proposed Policy regarding:

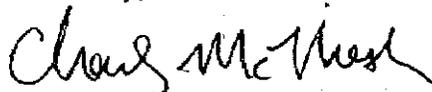
- Salinity management plan requirements,
- Lack of clarity in narrative toxicity objectives,
- Nitrogen threshold criteria and nutrient management practices,
- Groundwater monitoring requirements,
- Anti-degradation policy implementation, and
- Procedures for coordinating between Regional Boards and the Department of Public Health.

Tam M. Doduc, Chair, and Board Members
State Water Resources Control Board
March 10, 2008
Page 2

It is our understanding that the Association of California Water Agencies (ACWA) and the WaterReuse Association are submitting detailed comments on the issues identified above. Our district has reviewed their comments during the process of developing the proposed Policy, and we are confident that we can endorse and fully support their formal comment letters, which are due today.

Thank you on behalf of Scotts Valley Water District for your consideration of our concerns.

Yours truly,



Charles McNiesh
General Manager

cc. ACWA