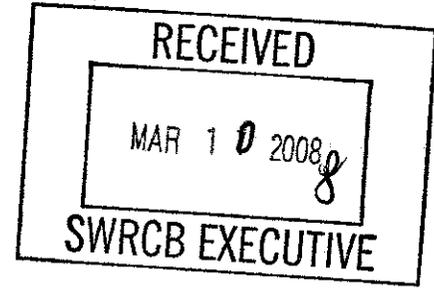


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March 10, 2008

Chair, Tam Doduc and Board Members
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Sent via electronic mail to: commentletters@waterboards.ca.gov**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

Mary K. Snyder
District EngineerStan R. Dean
Plant ManagerWendell H. Kido
District ManagerMarcia Maurer
Chief Financial Officer

Subject: SRSCD Comment Letter – Revised Proposed Recycled Water Policy and Revised Draft Certified Regulatory Program Environmental Analysis

Dear Chair Doduc and Members of the Board:

The Sacramento Regional County Sanitation District (SRCS D) appreciates the opportunity to submit comments on the proposed State Water Resources Control Board's (State Water Board) draft Statewide Water Recycling Policy (Draft Policy) and draft Staff Report and Certified Regulatory Program Environmental Analysis – water recycling policy (Draft Staff Report).

The SRCS D provides wastewater conveyance and treatment services to over 1.3 million people in the Sacramento region. In addition, the SRCS D owns and operates a 5-mgd Water Reclamation Facility that produces high-quality recycled water that is used by select customers in our region for non-potable purposes in-lieu of potable water. This recycled water is a new water supply that is safe to use, is drought-resistant, and helps to extend the local and State water supplies. SRCS D is currently evaluating the feasibility of expanding its water recycling efforts to a much larger scale, and the proposed Draft Policy will impact SRCS D's ultimate decision.

While we had hoped that the revised Policy would help achieve the state's goal of removing barriers to use of recycled water, we regrettably find ourselves faced with a draft Policy that, as written, does not accomplish this goal. For this reason, the SRCS D requests that the State Water Board not adopt the Draft Policy and Draft Staff Report as currently proposed.

We support the comments being submitted by the California WaterReuse Association (WaterReuse), the California Association of Sanitation Agencies (CASA), and the Central Valley Clean Water Association (CVCWA). We join these agencies in recommending that the State Water Board not adopt the Draft Policy at this time, but convene a Stakeholder driven process to address key remaining issues of concern.

WaterReuse, CASA, and CVCWA have submitted comprehensive lists of comments on the Draft Policy and Draft Staff Report so we will not repeat all of their comments in this letter. However, we would like to highlight some of the important issues:

- The Draft Policy requires nutrient management practices or plans when the recycled water contains more than 3 mg/L of Total Nitrogen. However, there is no scientific evidence provided to back this number.

Technology in balance with nature

If the 3 mg/L threshold is put in an adopted policy, then our water reclamation facility, along with many other facilities in the state, will need to make significant expenses to comply with these requirements.

- The Draft Policy presumes that local agencies can control water softeners to limit salts, which is not accurate – there are legal limitations and obstacles for prospective controls and no ability to retrospectively ban residential softeners. This real limitation on a local agencies' authority to conduct source control efforts must be recognized if the policy is to truly advance water recycling.
- Although the Draft Policy revises the total dissolved solids (TDS) interim limit, the Draft Policy still proposes that this constituent be measured on a monthly basis. The measurement of source water TDS on a monthly basis is problematic since most water producers in our area sample for TDS on an annual basis at best, while others sample every 2 years and some once every 10 years. In addition, although our treatment facilities could meet the 550 mg/L TDS above source water currently on an annual basis, we have concerns that we may not meet that value consistently on a monthly basis, thereby reducing the availability of recycled water.
- The Draft Policy's approach to groundwater monitoring is unclear. One provision seems to imply monitoring is not needed, but other provisions give Regional Boards the authority to require monitoring under certain circumstances. This further contributes to the lack of clarity which will frustrate project planning. In addition, this lack of clarity could undermine the cohesive development of the monitoring plans needed to truly support regional salinity management.
- The anti-degradation language does not adequately address the components of the Anti-degradation Policy, particularly with regard to defining prevention of nuisance and pollution, maximum benefit, and best practical treatment and control (BPTC). Without addressing this issue, the Draft Policy cannot insure it will not unreasonably affect beneficial uses.
- The Draft Policy includes numerous references to the Clean Water Act without explaining how the Act is relevant or applicable to recycled water irrigation and recharge. This uncertainty about the Policy's intent and what is intended by Clean Water Act compliance, creates a regulatory environment that can frustrate the development of projects.

We recommend that these issues be addressed for the SRSCD to support a recycled water policy. Thank you for your consideration of our concerns.

Sincerely,



Wendell H. Kido
District Manager

Ramirez. Jose (MSA)

From: Ramirez. Jose (MSA)
Sent: Monday, March 10, 2008 11:01 AM
To: Robles. Ruben (MSA)
Cc: Kido. Wendell (MSA); Mitchell. Terrie (MSA); Seyfried. Robert (MSA)
Subject: FW: SWRCB's Proposed Recycled Water Policy - SRCSD's CommentsLetter
Attachments: 20080310.SRCSDs Comments letter.SWRCBs Draft RW Policy.pdf

FYI.

-----Original Message-----

From: commentletters [mailto:commentletters@waterboards.ca.gov]
Sent: Monday, March 10, 2008 10:58 AM
To: Ramirez. Jose (MSA)
Subject: Re: SWRCB's Proposed Recycled Water Policy - SRCSD's CommentsLetter

Thank you for your submittal.

NOTE: If your submittal was received prior to the stated comment deadline, it will be considered an official submittal of comments.

If it is received after the deadline period (time and/or date), it will be considered a late comment and will not be part of the record.

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
916-341-5600

>>> ramirezj 03/10/08 10:57 >>>

Dear Chair Doduc and Members of the Board:

Thank you for the opportunity to review and submit comments on the State Water Resources Control Board's Draft Water Recycling Policy (Draft Policy). Attached to this email you will find the comments letter from our agency regarding this matter.

Sincerely,

Jose R. Ramirez, P.E.
Sacramento Regional County Sanitation District
10545 Armstrong Avenue, Suite 101
Mather, CA 95655

Phone: 916.876.6059. Fax: 916.876-6160

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