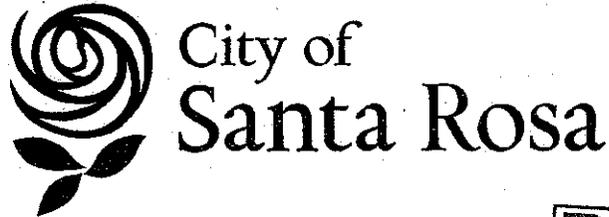
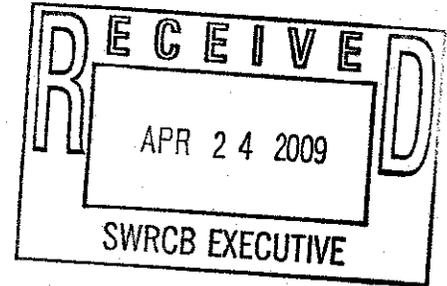


April 24, 2009



Charles R. Hoppin, Chair and Members
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



ATTN: Jeanine Townsend, Clerk to the Board
commentletters@waterboards.ca.gov

RE: Comment Letter—Landscape Irrigation General Permit

Dear Chair Hoppin and Members of the Board:

The City of Santa Rosa is an active member of the Association of California Water Agencies (ACWA), The California Association of Sanitation Agencies (CASA) and WaterReuse California and helped develop and supports the points made in the collectively crafted comment letter you have received. The City appreciates the Board's efforts to develop a sensible and useful General Permit that satisfies the goals and intent of the recently adopted Recycled Water Policy, AB 1481 and Title 22.

The City supports the general approach for BMPs in Attachment C whereby the use of the first four BMPs are mandatory (consistent with the Water Recycling Policy) and the remaining strategies are optional practices and can be tailored to meet specific site needs. However, the State Water Board should revise Attachment C to make this general approach more clear. For example, the first section could remain titled "Required BMPS." A second section that includes the optional practices could be titled "Optional Management Strategies." We are concerned that, without this clarification, some options (particularly some that are prescriptive and locally infeasible) may become required.

The City has implemented numerous management strategies to assure all water we supply to customers (recycled and potable) is properly managed and any runoff is incidental. No irrigation system can be operated such that runoff never occurs, yet in the North Coast Region Basin Plan, any discharge, including incidental runoff, is prohibited during the summer. Although this probation was not intended to preclude water recycling, it in fact prevents implementation of the 1,000 million gallon per year Santa Rosa Urban Reuse Project. The General Permit for Landscape Irrigation should not create similar barriers to recycling by allowing optional management strategies to be misinterpreted in the future.

Thank you for your consideration.

Daniel C. Carlson
Deputy Director – Operations
City of Santa Rosa

DCC/lh

UTILITIES DEPARTMENT
4300 Llano Road • Santa Rosa, CA 95407
Phone: (707) 543-3350 • Fax: (707) 543-3399
www.SantaRosaUtilities.com