



# Central Contra Costa Sanitary District

FAX: (925) 228-4624

Sent Via Email

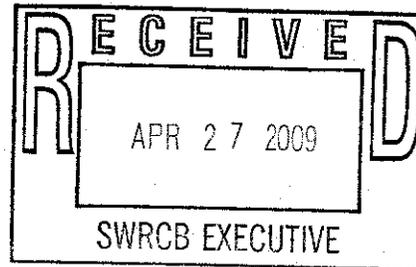
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(510) 808-2000

April 27, 2009

ELAINE R. BOEHME  
Secretary of the District

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)



Dear Ms. Townsend:

## COMMENT LETTER – LANDSCAPE IRRIGATION GENERAL PERMIT

The Central Contra Costa Sanitary District (CCCSD) has been developing and operating a successful recycled water program since 1997. We currently produce and distribute over 225 million gallons per year of recycled water to 32 customers in the cities of Pleasant Hill, Concord, and Martinez in the San Francisco Bay Area. Our customers use recycled water for a variety of uses including landscape irrigation, commercial applications (such as truck washing and concrete manufacturing), and dual plumbing inside buildings. Our recycled water program is operated under General Water Reuse Order 96-011 issued by the San Francisco Bay Regional Water Quality Control Board. This permit provides the appropriate level of regulation, monitoring, and reporting without being excessively burdensome to our ratepayers and without discouraging the use of recycled water by our customers. In addition, our General Water Reuse Order has helped streamline the permitting process for individual customers, allowing us the flexibility to continue to expand our recycled water program to serve a variety of uses and free up potable water to enhance the State's water supplies.

We have reviewed the proposed *Draft General Waste Discharge Requirements for Landscape Irrigation Uses of Municipal Recycled Water* (General Permit), and we believe our existing permit is much more conducive to allowing us to cost-effectively operate and expand our recycled water program. Consequently, we would not opt for replacing our existing General Water Reuse Order with the proposed General Permit. In addition, because the proposed General Permit is restricted to landscape use, the proposed permit offers no means for us to develop non-irrigation uses (such as industrial and commercial applications), which represent a much larger potential demand than irrigation uses and thus provide the greatest opportunities to increase recycled water use.

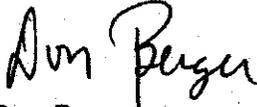
We also feel that the proposed General Permit is too onerous and restrictive and will actually discourage the use and expansion of recycled water in California. For example, the proposed Recycled Water Use Area Monitoring and Daily Reporting Requirements in Appendix F will require significant additional resources of time and money and are not practical or cost-effective

for most recycled water customers. These and other requirements of the proposed General Permit may cause existing and potential customers to decide that it is not worth the hassle and effort to use recycled water. We also have concerns about the substance and prescriptive nature of some of the optional BMP strategies as well as the potential for regulatory creep, i.e. that some options may become required.

Overall, we are concerned that the proposed General Permit would exclude many existing landscape irrigation projects or otherwise not operate as intended. Some provisions are inconsistent with the State Recycled Water Policy, unnecessarily prescriptive or redundant, and overly burdensome for a permit to water landscapes with recycled water. The General Permit's requirements in the Monitoring and Reporting Program to monitor daily and conduct weekly site investigations for each use area would be excessive and unnecessary for many landscape irrigation projects. Lastly, there is no provision in the General Permit for industrial or commercial uses, and residential irrigation (another potentially large demand) is specifically not allowed.

We hope that our suggestions in this letter and the detailed comments provided by WateReuse, CASA, and ACWA will help the Board create a permit that is more conducive to achieving the declared intent of this statewide permit – promoting the use of recycled water in California. If you have any questions, please contact me at 925-229-7259 or [dberger@centralsan.org](mailto:dberger@centralsan.org).

Sincerely,



Don Berger  
Recycled Water Program Manager

DB/mvp

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