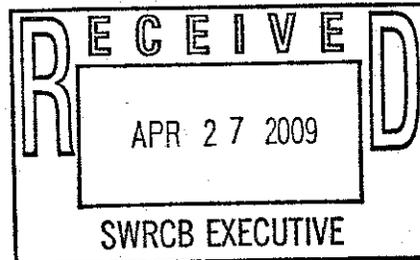




CALIFORNIA FARM BUREAU FEDERATION
NATURAL RESOURCES AND ENVIRONMENTAL DIVISION

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April 27, 2009



Via First-Class Mail & Email
commentletters@waterboards.ca.gov

Jeanine Townsend,
Clerk to the Board
STATE WATER RESOURCES CONTROL BOARD
1001 I Street, 24th Floor
Sacramento, CA 95814

Re: *Comment Letter-Landscape Irrigation General Permit (Uses of Recycled Water)*

Dear Chairman Hoppin and Members of the Board:

The California Farm Bureau Federation ("Farm Bureau") is a non-governmental, non-profit, voluntary membership California corporation whose purpose is to protect and promote agricultural interests throughout the state of California and to find solutions to the problems of the farm, the farm home and the rural community. Farm Bureau is California's largest farm organization, comprised of 53 county Farm Bureaus currently representing approximately 85,000 members in 56 counties. Farm Bureau strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California's resources.

Farm Bureau appreciates the opportunity to comment on the proposed adoption of a resolution approving a Mitigated Negative Declaration covering the General Waste Discharge Requirements for Landscape Irrigation uses of Municipal Recycled Water, and the proposed adoption of the General Permit.

Recycled Water Should Be Used for Landscape Irrigation:

Farm Bureau supports the development and use of recycled water for a supplemental supply, especially in areas where fresh supplies may be limited or in urban areas for uses such as landscape, public parks and golf course irrigation. Water supply and water supply reliability should be a high priority in the state, especially in times of drought and heightened competition for limited water supplies. Water resulting from the treatment of municipal wastewater will provide a much needed additional source of water for irrigating parks, greenbelts, playgrounds, school yards, athletic fields, golf course, cemeteries, residential landscaping and commercial

Landscape Irrigation General Permit (Uses of Recycled Water)

landscaping, and thus potentially relieve pressures on other sources of water.¹ Nevertheless, recycled water must be adequately treated to ensure water quality appropriate for current and future uses. The State Water Resources Control Board ("State Board") must ensure that groundwater, as well as surface water, is not degraded by constituents in recycled water, even after effective source control, treatment, and use controls are employed.

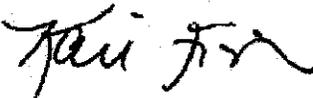
Among other water quality concerns, a major constituent of concern for Farm Bureau is salinity levels in recycled water. Excess salinity impedes crop growth and development, reduces crop yields, and can deteriorate the soil structure. Even though the General Permit is for the application of waste constituents to landscape and recreational areas, water quality, especially with regard to salinity levels, must be protected. Recycled water used for landscape irrigation may replenish and recharge underlying groundwater basins. Given that salinity accumulates in groundwater, there must be sufficient processes in place to insure high water quality, especially for future agricultural uses of those groundwater basins.

Relying upon sound science, Farm Bureau urges the State Board to continue to research the treatment of recycled water and effective source control and use control measures. In addition, the State Board should propose water quality standards for recycled water in order to protect water supplies for present and anticipated future uses.

Conclusion:

Thank you for the opportunity to provide our comments. We look forward to further involvement and discussion with the State Board on the development of General Waste Discharge Requirements for Landscape Irrigation uses of Municipal Recycled Water.

Sincerely,



Kari E. Fisher
Associate Counsel

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¹ Farm Bureau supports the scope of the term "landscape irrigation" as currently defined in the General Permit.