

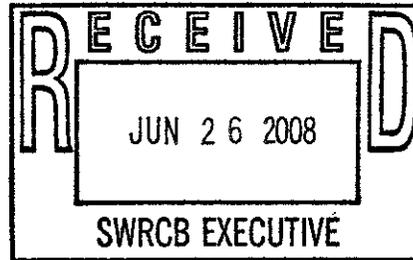
Public Workshop
Landscape Irrigation
Deadline: 6/26/08 by 12 p.m.



CITY OF
SANTA ROSA

UTILITIES DEPARTMENT
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June 19, 2008



State Water Resources Control Board
1001 "T" Street
Sacramento, CA 95814
Attn: Ms. Jeanine Townsend, Clerk

Via Email to: commentletters@waterboards.ca.gov

**Re: Scoping Comments on Landscape Irrigation Uses of Recycled Water –
Proposed State Board General Permit**

Dear State Board Members & Staff:

The City of Santa Rosa provides tertiary treatment of all municipal wastewater flows and reuses approximately 95% of its annual recycled water production of 24,000 acre-feet (AF). The City has certified a CEQA document and conducted pre-design studies on the Santa Rosa Urban Reuse Project that increase recycled water use by 3,000 AF per year. For every AF of recycled water reused, the Project would offset one AF of potable water needs for the region. Of significant concern to the City is the manner in which minor amounts of incidental runoff are managed and regulated, and the inconsistent approaches used by the various Regional Water Boards. If not resolved, this issue not only will delay or eliminate the proposed SRURP, but could require the City to reduce existing recycled water reuse projects. To address this issue, we urge the State Board, through policy or General Permit, to eliminate incidental runoff as an obstacle to water recycling. On this basis, we offer comments regarding the scope of the proposed General Permit for Landscape Irrigation Uses of Recycled Water.

CEQA requires the State Board to evaluate the environmental and related impacts of the "No Project Alternative" just as broadly and comprehensively as any other project alternative. The City believes this means the State Board must evaluate the impacts of *not removing* regulatory barriers and roadblocks related to incidental runoff and the potential impacts such failure would have to water recycling efforts throughout the State. Furthermore, the City believes such an analysis will show that irrigation with potable water instead of recycled water will occur, thus reducing the quantity of water available for beneficial uses. Specifically, and in light of the Governor's recent "Drought Declaration" that affects all Californians, it is necessary for the State Board's CEQA evaluation to consider the potential impacts related to the "No Project Alternative" that would tend to exacerbate the drought conditions referenced in the Governor's Declaration.

The City also requests that the State Board evaluate all potential impacts of an "overly restrictive alternative" that would impede the use of recycled water throughout the State. For example, such an alternative would define incidental runoff as that which occurs only after measures are implemented that are considered to be infeasible by the recycling community (both producers *and* users) and provide no water quality benefit. Under such an "overly restrictive" alternative, new roadblocks to water recycling are erected instead of eliminated. This would not only reduce available water resources, but it would undoubtedly lead to higher energy use and the production of greenhouse gas emissions related to developing and/or importing new potable water sources. Evaluating these alternatives will put in perspective the benefits and impacts of a range of regulatory alternatives, which is the intent of the CEQA process.

As you know, the State convened the Recycled Water Task Force in 2003 to develop recommendations that would eliminate impediments to meeting the goal of adding One Million Acre Feet of recycled water by 2010, as included in the State Water Plan. Ultimately, every alternative which may be considered by the State Board staff to be included in the General Permit must evaluate the impacts of incremental burdens imposed on recycled water users to determine if the Recycled Water Task Force recommendations will be met.

During the State Board's CEQA Scoping Session on the General Permit, held June 18, 2008, staff proposed a working definition of "landscape irrigation" uses that would be covered by the proposed General Permit. Specifically, that working definition included parks, playgrounds, school yards, *residential landscaping* and common areas, golf courses, cemeteries, and *freeway landscaping*. Noticeably absent from this list of allowable uses are "commercial and industrial landscaping", as well as "street landscaping" such as thoroughfare medians and other streetscapes. The City believes that these additional uses should be added to the working definition because there are no practical differences between "residential landscaping" and "commercial and industrial landscaping." Further, there is no reasonable distinction between "freeway landscaping" and "street landscaping" as described above. By omitting these additional uses from the working definition of "landscape irrigation," the State would lose significant recycling opportunities throughout the state. If the State Board elects to *not* include these additional uses, then the CEQA analysis *must* address the various environmental impacts associated with having to construct, operate and maintain a separate, potable water irrigation system for these areas. At a minimum, such an analysis should consider the construction-related, air quality, energy demand, greenhouse gas production, and economic effects of requiring potable water to be made available for these additional landscape uses.

Thank you for the opportunity to provide these comments.

Sincerely yours,



Miles Ferris
Director of Utilities