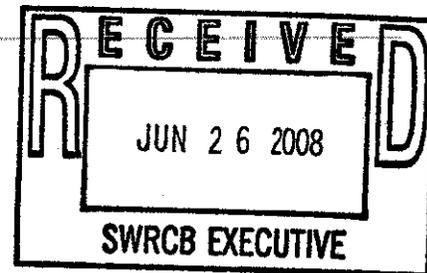


commentletters - Comment Letter-Landscape Irrigation General Permit

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

From: "Arakawa, Stephen N" <sarakawa@mwdh2o.com>
To: <commentletters@waterboards.ca.gov>
Date: Thursday, June 26, 2008 5:10 PM
Subject: Comment Letter-Landscape Irrigation General Permit
CC: "Jay, Raymond R" <RJay@mwdh2o.com>



To: Jeanie Townsend, Clerk of the Board

June 26, 2008

Ms. Tam M. Doduc, Chair **VIA U.S. MAIL**
 Members of the State Water Resources Control Board **& VIA EMAIL**
 State Water Resources Control Board commentletters@waterboards.ca.gov

P.O. Box 100

Sacramento, CA 95812-0100

LATE COMMENT

Dear Chair Doduc and Board Members:

Comments on Statewide General Permit for Landscape Irrigation Uses of Recycled Water

The Metropolitan Water District of Southern California appreciates the opportunity to have participated in your workshop of June 18, 2008, regarding development of a statewide General Permit for Landscape Irrigation Uses of Recycled Water. Metropolitan has the following comments.

The General Permit should fully address the legislatures declared policies cited in

AB 1481(De La Torre, 2007) and summarized below:

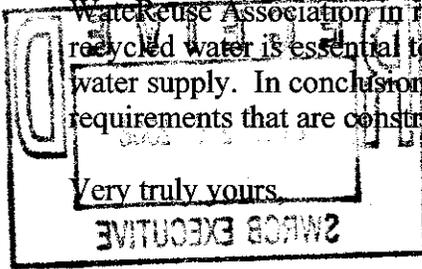
- Implement all possible steps to encourage the development of water recycling to meet the growing needs of the state;
- Potable domestic water use for nonpotable uses, such as irrigation is a waste and unreasonable use; and
- Inconsistent regulation has led to overly restrictive and costly water recycling requirements creating an obstacle to achieving the full potential of water reuse.

Specifically, Metropolitan would like the SWRCB to find that:

- Anti-degradation is not applicable for this specific use of recycled water barring extraordinary rare circumstances;
- Most water recycling projects and this General Permit should proceed under a negative declaration finding of CEQA due to the de minimus risk and impact of recycled water for irrigation uses;

- Most all questions related to salt management can be satisfied by salt balance calculations considering all input and outflows in a basin; and finally
- Only in the most extraordinary cases would any monitoring of ground water be considered as a condition of the permit.

We also wish to make it known that we support the written comments submitted on this matter by the Water Reuse Association in its June 26, 2008 letter. Establishing an improved permitting process for recycled water is essential to Southern California effectively planning and developing a reliable future water supply. In conclusion, we are requesting that the SWRCB eliminate unnecessary permitting requirements that are constraining development and use of recycled water.



Stephen N. Arakawa

Manager, Water Resource Management