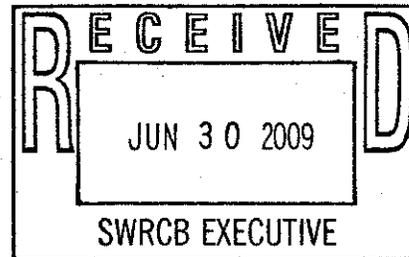




Environmental Utilities  
Administration  
2005 Hilltop Circle  
Roseville, California 95747

June 30, 2009

Charles Hoppin, Chair, and Members  
State Water Resource Control Board  
1001 I Street  
Sacramento, CA 95814



ATTN: Jeanine Townsend, Clerk to the Board  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

RE: **City of Roseville Comments on Draft General Waste Discharge Requirements for Landscape Irrigation Uses of Municipal Recycled Water (dated 06/18/2009)**

Dear Chair Hoppin and Members of the Board:

The City of Roseville (City) appreciates the opportunity to provide comments on the *Draft General Waste Discharge Requirements for Landscape Irrigation Uses of Municipal Recycled Water* (Permit). Increased use of recycled water is critical to California's water supply future, and the Permit should facilitate and promote the beneficial use of recycled water for landscape irrigation.

The City has four comments on the Draft dated 6/18/2009:

1. Page 14 of 22, Item 4 – The term “Waste Constituents” should be changed to “Recycled Water”. The term “Recycled Water” should be used because these are Waste Discharge Requirements for “Recycled Water”. Using the term “Recycled Water” would also be consistent with the Recycled Water Policy. The City has commented on this issue in two previous comment letters dated April 27, 2009 and May 26, 2009. Because Board Staff has not provided response to comments, it is not clear why this simple and important change has not been made.
2. Monitoring and Reporting Program – “Volume of additional water” – Reporting monthly precipitation is not feasible, of little benefit and should be removed. Precipitation data would be rough approximations at best. This adds cost to the reporting effort with no real benefit.
3. Monitoring and Reporting Program – “Nitrogen application rate” – Reporting “nitrogen application rate” is of little benefit and it should be removed. The amount of nitrogen present in recycled water is measured at the Treatment Plant

and reported to the Regional Boards. This fact coupled with irrigated areas and irrigation water quantities makes this requirement redundant. The Regional Board can make this calculation without an additional reporting requirement. Additionally, reporting fertilizer use is not feasible. This level of oversight on private use sites is exceedingly difficult. Reporting fertilizer use will be at the discretion of the Site Supervisor since actual oversight of fertilizer use is not feasible. This adds cost to the reporting effort with no real benefit.

4. Monitoring and Reporting Program – “Salinity application rate” – Reporting “salinity application rate” is of little benefit since this can be calculated by the Regional Board based on the other information being provided. This adds cost to the reporting effort with no real benefit. Comment 6 under the table of parameters refers to other sources of salinity. What other sources of salinity are being referred to?

The City supports the State Water Board's effort to streamline the process to permit landscape irrigation with recycled water projects. Landscape irrigation with recycled water is a practical and effective way to save potable water supplies for higher use. The City cannot support a Permit that is so onerous in its oversight and monitoring requirements that it makes the cost and feasibility of increased water recycling through this permit unlikely..

Sincerely,



Art O'Brien  
Wastewater Utility Manager  
City of Roseville