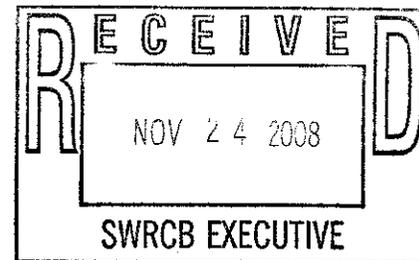


Public Comment
Recycled Water Policy
Deadline: 12/22/08 by 12 noon

From: "Ken Girouard" <ken@sscwd.org>
To: commentletters@waterboards.ca.gov
Date: Mon, Nov 24, 2008 11:31 AM
Subject: Comment Letter - Proposed Recycling Water Policy



Dear State Water Resources Control Board:

Regarding the proposed recycling water policy, I would suggest one major change. The major change I would suggest is the provision of "unrestricted irrigation use" for recycled water where recycled water meets several requirements. The requirements would include tertiary treatment, disinfection, and maintaining disinfection residual in the recycled water distribution system, along with distribution system monitoring, and requirements for a disinfection (chlorine) residual in the recycled water system similar to the same requirements in the potable water system. If a recycled water system met these requirements (which would be identical to the drinking water system requirements), the recycled water could be used for unrestricted irrigation use.

The problem with the current system is that there is no monitoring requirement in the recycled water system for disinfection, and ongoing testing for disinfection and fecal coli form and other biological indicators. Under existing circumstances, residential customers can only use recycled water in street landscaping, parks, golf courses, and in the front yards of residential housing developments (with restrictions on front yard operation and maintenance). Under current conditions, back yards of single family residences can not be irrigated at all under any circumstances with recycled water. As such, an ordinary residential development would need 3 different production, treatment and distribution systems to provide for drinking water, recycled water for restricted landscape use, and another water system for unrestricted landscape use. The new recycled water policy must allow every development to have two water systems: one water system for potable drinking water, and a second recycled water system for unrestricted irrigation.

The new recycled water policy must allow for the irrigation of single family residences with recycled water. The new recycled water policy needs to establish standards on a state wide basis for new construction. All new construction of all new subdivisions and commercial development must include provisions for potable drinking water and for recycled water with unrestricted use for landscaping. The distribution monitoring for potable water and recycled water should be identical.

Without the provision for unrestricted use of recycled water for irrigation, California will fail to expand the current recycled water systems past irrigations for street landscapes, golf courses, and limited commercial and residential irrigation. A new stricter standard for recycled water must be adopted to allow for unrestricted landscaped irrigation if California will meet the residential and agricultural irrigation needs facing the State of California.

Sincerely,

Kenneth Girouard

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