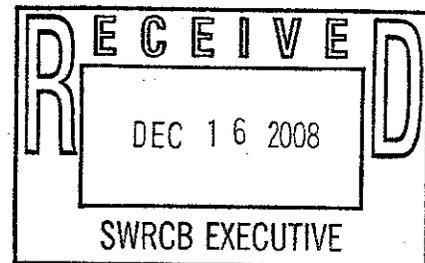




December 16, 2008

Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814



**RE: Proposed Recycled Water Policy**

Dear Ms. Townsend:

The California League of Food Processors (CLFP) is a statewide trade association that represents food processing companies with facilities in California. These companies collectively use billions of gallons of water each year and discharge large volumes of wastewater. Two provisions of the proposed Recycled Water Policy would, if enacted, directly affect wastewater discharges by food processors. CLFP's comments of the proposed Recycled Water Policy will focus on those two areas.

CLFP appreciates efforts by the State Water Board (SWB) to develop a comprehensive plan to expand the statewide use of recycled water and storm water and to substantially increase water conservation. Water conservation and reuse is not an option for California, it is a necessity. The state's population is projected to increase nearly 50 percent between 2005 and 2030, to about 52 million residents. This growth will require a substantial and dependable supply of water. New sources of water are likely to be limited due to ongoing political opposition to large scale water storage projects, the high cost of desalination, and reduced snow pack due to climate change. As a result, water reuse and conservation must be pursued vigorously to avoid an environmental and economic catastrophe in the decades ahead.

Proposal for the Development of Salt/Nutrient Management Plans

Salinity is clearly a serious long run problem in many areas of California. CLFP is participating in both the CV-SALTS effort organized by the Central Valley Regional Water Quality Control Board, and the recently formed Central Valley Salinity Coalition (CVSC). Both CV-SALTS and CVSC will be working diligently over the next few years to help develop a salt management plan for the San Joaquin Valley. This effort will take a substantial amount of time, effort, data, and analysis. Completing the plan within the next five years will be a daunting task. Despite the enormity of the effort, CLFP looks forward to working with the Regional Board and other stakeholders to develop a plan that

is based on proven science and sound economics and will provide a path for addressing the long run salinity problem in the Valley.

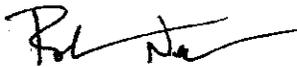
Antidegradation Policy

How the anti-degradation policy is applied by regulators will directly affect water recycling. State Water Board Resolution 68-16 requires that dischargers use the best practicable treatment or control (BPTC) necessary to avoid pollution and to maintain the highest water quality consistent with the maximum benefit of the people of the state. The application of this general requirement at any given site can be quite subjective.

CLFP believes that the determination of BPTC should be industry and/or site specific, based on proven and currently available technology, and take into consideration economic and secondary environmental factors. For example, reverse osmosis (RO) wastewater filtration technology is not a feasible BPTC for many food processing plant applications. The high organic loads in the wastewater tend to cause significant and expensive operational challenges. RO systems require large amount of energy, generating high costs and greenhouse gases. RO systems also generate significant amounts of concentrated brine that must be disposed, potentially creating other negative environmental affects. As a result of these factors other options must be considered for the food processing industry.

CLFP appreciates the opportunity to present its views on this topic. If you have any questions regarding this letter or the potential impact of the proposed Recycled Water Policy on food processors please contact me.

Sincerely,



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