

3152 Shad Court  
Simi Valley, CA 93063  
December 22, 2008

State Water Resources Control Board  
Ms. Jeanine Townsend, Clerk to the Board  
1001 I Street  
Sacramento, CA 95814

Re: "Comment Letter - Proposed Recycled Water Policy."

Dear Members of the Board:

While I support a statewide recycled water policy, and consistent interpretation, in light of: 1. the TCE, Perchlorate and other potential plumes resulting from the Rockwell International/Boeing Company Santa Susana Field Laboratory (SSFL) activities (Los Angeles Regional Water Board); 2. the Rialto area Perchlorate contamination of groundwater (Santa Ana Regional Water Board, Cleanup and Abatement Order No. R8-2005-0053); and 3. the City of Merced Beachwood neighborhood's Chromium 6 groundwater contamination (December 21, 2008, "Senators want probe of Merced case", and "Toxics battle in Merced neighborhood", [www.sfgate.com](http://www.sfgate.com); Central Valley Regional Water Board), I am opposed to allowing "projects that use less than ten percent of the available assimilative capacity within a groundwater basin or sub-basin, or for multiple projects less than twenty percent of the available assimilative capacity, to be approved without further anti-degradation analysis" (Page 10, November 19, 2008 Draft Staff Report, 2F: Anti-degradation; second paragraph, second sentence).

Members of the Board, I am also opposed to allowing groundwater recharge projects that use "less than ten percent of the available assimilative capacity with respect to salts and nutrients or for multiple projects uses less than 20% of the available assimilative capacity need only conduct an analysis verifying the use of assimilative capacity" (Pages 7 and 8, November 19, 2008 Draft Staff Report, Anti-degradation; Page 7 bottom, and Page 8 top).

Then, too, I am opposed to allowing "recycled water irrigation projects that meet the criteria for streamlined permitting and that are consistent with adopted Regional

Corrected MS4

2

Water Board salt/nutrient management plans to be approved without further analysis of degradation (Page 7, November 19, 2008 Draft Staff Report, Anti-degradation; next to last paragraph, second sentence).

Members of the Board, in light of the State's Anti-degradation Policy (Resolution No. 68-16) possibly being amended in the near future for surface and groundwater, it is premature to outright state unequivocally at this point in time that, with regards to a regional salt/nutrient management plan, "After the plan is adopted, any proposed project that is consistent with the anti-degradation provisions of the plan would be found to be in compliance with the Anti-degradation Policy" (Page 10, November 19, 2008 Draft Staff Report, 2F: Anti-degradation; first paragraph, second sentence).

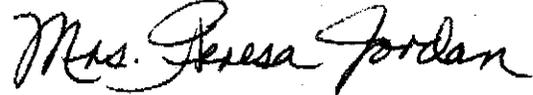
Members of the Board, the November 19, 2008 Draft Staff Report's Page 9 must be amended due to the type-O in the third sentence of the first paragraph, under 2-D: Landscape Irrigation Projects, which reads "As such, the proposed Policy may, in some cases, allow the discharge the incidental runoff of recycled water into a municipal separate storm sewer system". On November 21, 2008, I wrote a letter to Mr. Gordon Innes to this effect. On November 25, 2008, Mr. Innes telephoned. The corrected statement reads "As such, the proposed Policy may, in some cases, allow the discharge of incidental runoff of recycled water into a municipal separate storm sewer system". I thought that there would be a notice to this effect on your Website's Documents for Public Comment section, but to date the original page with the inaccuracy is still posted.

Members of the Board, since the error on Page 9 of the November 19, 2008 Draft Staff Report must be corrected, I ask that to the end of the sentence "As such, the proposed Policy may, in some cases, allow the discharge of incidental runoff of recycled water into a municipal separate storm sewer system" "(MS4)" be added.

Members of the Board, if the numbering sequence on the sides of pages 1 through 14 of the DRAFT November 4, 2008 Recycled Water Policy is to remain, then, I ask that the numbers on the sides of the pages be deleted. This is distracting. While it is customary to have legal briefs thus numbered, each page begins and ends with the same numbering sequence; not a continuous numbering system.

Members of the Board, I formally request a copy of the November 26, 2007 Memorandum of Understanding (MOU) between the Cal/EPA and Resources Agency that established the California Water Quality Monitoring Council. I will cover the copying and mailing costs. Also, I ask that this document be posted on your Website's Monitoring section under the California Water Quality Monitoring Council. Thank you.

Sincerely,



Mrs. Teresa Jordan

Enclosure:

November 21, 2008, Letter to Mr. Gordon Innes, State Water Resources Control Board; NOTICE OF OPPORTUNITY FOR PUBLIC COMMENT - PROPOSED RECYCLED WATER POLICY AND DRAFT CERTIFIED REGULATORY PROGRAM ENVIRONMENTAL ANALYSIS. (Unsigned)

3152 Shad Court  
Simi Valley, CA 93063  
November 21, 2008

Mr. Gordon Innes  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

Re: NOTICE OF OPPORTUNITY FOR PUBLIC COMMENT - PROPOSED  
RECYCLED WATER POLICY AND DRAFT CERTIFIED REGULATORY  
PROGRAM ENVIRONMENTAL ANALYSIS.

Dear Mr. Innes:

I am writing to ask for clarification on a sentence in the November 19, 2008 Draft Staff Report for the aforementioned subject.

Mr. Innes, on Page 9, under "2- D: Landscape Irrigation Projects", it is stated in the third sentence of the first paragraph that "As such, the proposed Policy may, in some cases, allow the discharge the incidental runoff of recycled water into a municipal separate storm sewer system." Is the sentence supposed to read "...allow the discharger the incidental runoff...", or "...allow the discharged incidental runoff...", or "...allow the discharge of incidental runoff..."?

Mr. Innes, I would really appreciate a written response as soon as possible. Thank you.

Sincerely,

Mrs. Teresa Jordan

(Unsigned)

*December 22, 2008  
Mrs. Teresa Jordan*