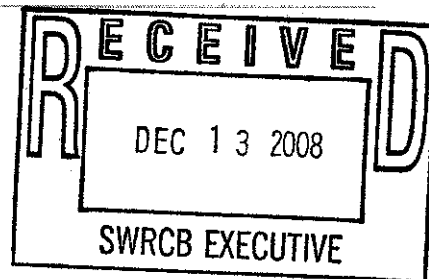


**commentletters - Comment Letter – Anti-degradation Policy (Resolution 68-16)**

Public Comment  
 Anti-Degradation Policy  
 Deadline: 12/17/08 by 12 noon

**From:** lee rennacker <leerenn.007avweyh@yahoo.com>  
**To:** <commentletters@waterboards.ca.gov>  
**Date:** Saturday, December 13, 2008 11:03 AM  
**Subject:** Comment Letter – Anti-degradation Policy (Resolution 68-16)



Lee Rennacker  
 15994 Maricopa Hwy., Ojai, CA 93023  
 (805) 646-2955  
 December 13, 2008  
 TO: SWRCB  
 Attn: Jeanine Townsend, Clerk to the Board  
 1001 I Street, 24th Floor  
 Sacramento, CA 95814

Comment Letter – Anti-degradation Policy (Resolution 68-16)

I am encouraged by the effort to protect and preserve the state's water quality. A critical component of this measure must be to permit across the board recycling of wastewater for irrigation. The use of wastewater for irrigation is the environmentally preferred technique dispersing effluent via a drip system at shallow depths where oxygen and bacteria exist.

This could substantially reduce the demand for use of potable water for

irrigation. Consider a drought condition (which is looming more and more on the horizon), the recycling of waste water could very well become a requirement, so why not (at a minimum) authorize the use of recycling waste water whenever and where ever a user would like to use it? Currently many counties permit recycling wastewater, and in some sensitive locations the recycling of wastewater is required via the drip system, but some counties are diametrically opposed this technique. The opposition has no legitimate argument, but a bevy of unsubstantiated claims regarding maintenance, costs, and permitting provisions.

The SWRCB is currently trying desperately to wrap up a statewide policy on residential wastewater dispersal use, but they have had great difficulty getting 58 counties to agree on the specifications. This new statewide standard is as directed by AB885, and was supposed to have been implemented

in 2004. Currently SWRCB staffs are close to finalizing the new statewide regulations for residential septic systems. Unfortunately, the new regulations provide the local agencies/counties to impose their own restrictions on septic systems such that although the statewide standard (AB885) statutorily allows drip dispersal, counties like Ventura County can and will continue to prohibit the use of drip dispersal systems for septic use.

I strongly encourage you to work with staff drafting the final regulations for AB885 to statutorily permit across the board/state without exception, qualified and accepted drip dispersal for residential septic use, and not allow individual counties to circumvent and or foot drag on this needed provision.

Please keep me updated on the progress of 68-16.

Sincerely,  
 Lee Rennacker