

General Manager

Robert S. Roscoe, P. E.



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

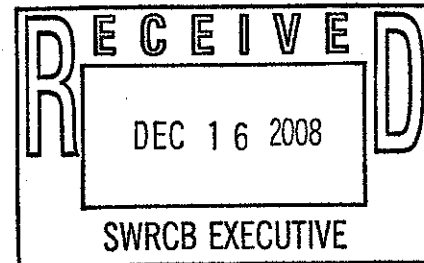
Board of Directors

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VIA E-MAIL

December 16, 2008

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



Subject: Periodic Review of Anti-Degradation Policy (Resolution 68-16)

Dear Ms. Townsend:

The Sacramento Suburban Water District (SSWD) appreciates the opportunity to provide comments on the State Board's consideration of whether the State's Anti-Degradation Policy (Resolution No. 68-16) should be revised with respect to groundwater. SSWD is a county water district located in the Northwest portion of Sacramento County serving approximately 168,000 residents. The District operates a conjunctive use water supply system providing surface treated water to its customers in wet years and groundwater in dry years. The District has invested over 100 million dollars in this water supply system in an attempt to alleviate the over-draft occurring in the groundwater basin located north of the American River. SSWD is interested in ensuring that any amendments to Resolution 68-16 are supportive of conjunctive use project implementation, particularly aquifer storage and recovery programs (ASR).

SSWD also has concerns about the application of a narrative toxicity standard to drinking water that meets state public health standards for human consumption. In particular, when the only use of the groundwater impacted by ASR projects is for water supply to communities for drinking water, the greater public benefit for use of the groundwater would seem to out-weigh the minute risk of degrading the quality of groundwater by injection of public drinking water permitted by the state.

SSWD is also very concerned about the uniform application of groundwater storage regulatory policies throughout California. It is our understanding, that other regions (other than the Central Valley Region) routinely allow the direct injection of DPH permitted public drinking water in ASR systems either with no regulatory oversight or routine issuance of low-threat waivers from discharge requirements. This places SSWD and other agencies within the Central Valley Region at a disadvantage when competing

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for state grant funding to support additional groundwater storage. Because of the build-out of our service area, options for groundwater recharge projects, other than injection of potable water directly into groundwater aquifers, are not available to us.

Sacramento Suburban Water District would welcome any opportunity to work with the State Water Resources Control Board to develop a policy that works to the benefit of the people of the State of California. If I can be of any assistance or answer any questions about SSWD's interest in the review of Resolution 68-16, please contact me at 916.679.3994.

Sincerely,



Robert S. Roscoe, P.E.  
General Manager

cc: SSWD Board of Directors  
Joshua Horowitz