



May 26, 2009

Mr. Charles R. Hoppin, Chair
and Members of the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA. 95812-0100
Attention: Jeanie Townsend, Clerk of the Board

Dear Chair Hoppin and Members of the Board:

Rose Hills Memorial Park has been irrigating approximately 350 acres of cemetery lawn with recycled water since 1997. We currently operate under the County Sanitation Districts of Los Angeles County (Sanitation Districts) permit.

In general we are supportive of the Sanitation Districts comment letter. We are of the opinion that the language of the permit should be such that would encourage and expedite the use of recycled water. Recycled water is not waste water, brown water, or gray water it is a renewable and affordable resource that has numerous appropriate applications.

Cemeteries in California are specified users of recycled water. Most cemeteries are small and do not have sufficient financial reserves to invest in retrofitting their property for recycled water. The requirements of Title 22 stand in the way of most specified cemetery users from placing one drop of recycled water on their landscape. The Title 22 requirement for all cemetery hose bibs to be potable water eliminates most cemeteries and forces them to continue to purchase potable water from the municipalities or to keep draining our diminishing ground water by operating their private wells. This seems like poor public policy and someone must champion this and other conflicts Title 22 presents.

In summary, the draft seems onerous to me, and it also seems that there is an antiquated mind set that is driving it. This is a wonderful resource for numerous applications but continues to carry a stigma of something to fear. The General Permit should at its most basic position be an encouragement to the use of recycled water not a labyrinth regulatory mumbo jumbo that retards the use.

Sincerely,

ROSE HILLS MEMORIAL PARK AND MORTUARY

Bruce A. Lazenby
Director of Property Development