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To: <LClyde@waterboards.ca.gov>
Date: 1/28/2009 4:10 PM
Subject: Comment on the Proposed Basin Plan Amendment

January 28, 2009

To: Lauren Clyde State Water Resources Quality Board
Re: Proposed Basin Plan Amendment

I live in Forestville, California, a short walk from the Russian River. My drinking water comes from wells adjacent to the river. I am very concerned about water quality in all areas of the Russian River watershed. What happens in any creek or reservoir in the watershed has the potential to affect the quality of my drinking water and my recreational activities.

I am very concerned about the SWRQB's proposal to allow "low threat" discharges and accidental irrigation discharges if they are "incidental" and "infrequent". The three terms, "low threat, incidental, infrequent" are vague terms in dealing with such issues as water quality and pollution.

What constitutes a "low threat" when dealing with recycled wastewater? Trying to determine what is in the wastewater coming from water treatment facilities is very difficult. I have experienced being at Sonoma County Water Agency meetings where that board is not interested in testing standards that go beyond the 150 or so regulated chemicals out of the thousands that exist or dealing with pharmaceuticals and personal care products, which are being found in the nation's drinking water. What do these chemicals do to wildlife and humans? We don't know and the stewards of our surface and ground water supplies seem to prefer not finding out. This is unconscionable as it is our duty to try to pass on to future generations an inhabitable Earth. "Low threat" must be defined and the plan must include a clause allowing for reopening the proposed amendment if new knowledge comes to light about the impact of chemicals on living things.

What constitutes "incidental" discharges? The word "incidental" has at least four meanings: "1. related or accompanying: related to or accompanying something more important 2. occurring by chance: occurring by chance or without intention 3. occasional: unimportant or occasional 4. resulting from something: occurring as a result of something." Very different results can come from an incidental discharge that happens by chance or without meaning to have something happen and an occasional or unimportant discharge. Incidental needs to be numerically defined so the plan can be regulated. "Infrequent" also needs to be numerically defined or any amendment so vaguely worded will be unenforceable.

The Russian River is facing lower and lower flows due to demands on water in our area. Great care must be given to establishing the time and place where wastewater irrigation takes place. Setbacks must be established where wastewater irrigation is taking place near surface water features to protect such bodies of water. Irrigation must not be allowed on soil, which has been treated with pesticides, herbicides, and fertilizers, which could result in any runoff into

surface water.

There needs to be specific language in the amendment which deals with those who are in repeated violate of the rules. Those who repeatedly violate the regulations should lose the right to irrigate with wastewater. The plan must have teeth and not allow for just monetary fines, which do not deter those who are well-heeled.

Thank you for your consideration in this very important matter. I hope you will take great care in dealing with your responsibilities overseeing our water resources.

Sincerely,

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