



Public Employees for Environmental Responsibility **NCRWQCB**

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Robert Klamt
Acting Executive Officer of the North Coast Regional Board
5550 Skylane Blvd. Ste. A, Santa Rosa, CA 95403

Re Resolution No. R1-2007-0073, Policy Statement in the Matter of Recycled Water Use in the North Coast Region and Executive Officer's Summary Report, August 21, 2007

Following are comments of Public Employees for Environmental Responsibility (PEER) on the subject resolution and Executive Officer's Summary Report. PEER is a national environmental group headquartered in Washington DC and having field offices in many states, including California.

The proposed resolution is extremely short-sighted and harmful to the public interest. We have looming problems of potable water supply, we know far too little about how much groundwater we actually have, and we are so close to the edge of our surface water supply that we will not be able to deal with protracted droughts without draconian conservation measures. While it is true that use of potable water for landscape irrigation, toilet flushing and the like, are a waste of potable water, there are far better solutions than the proposed growth-inducing uses of "recycled water," which only encourage the belief that we can go on growing exotic lawns without cost to our potable water supply.

Obvious solutions to urban landscape irrigation issues include landscaping with native plants that require little or no summer watering, and household by household conversions that directly pipe kitchen and bathroom sink drainage and laundry gray water for uses such as toilet flushing and supplemental landscape watering. This alternative would save potable water and reduce of waste water production at the same time. To more responsibly manage excess waste water we must treat it to sufficiently high standards so that it is potable. Returning such water to groundwater aquifers would greatly reduce the heavy demand we now place on that critical source of potable water.

Another benefit of this approach to managing waste water is that it eliminates the danger of public exposure when waste waters from mixed wastes, including sewage, are used for urban landscape irrigation. It is becoming clear that, unfortunately, tertiary treatment with disinfection does not remove enough pathogens, pharmaceuticals, or chemical breakdown products.

The urban landscape is a major supplier of contaminated runoff to streams, reservoirs, and groundwater. This is a particularly virulent problem in summer when there is less surface water to dilute the contaminated runoff. This problem may not be ameliorated by avoiding use of waste



water for urban irrigation, but applying the treated waste water certainly will exacerbate the problem.

The Executive Officer's Summary Report indicates an intention to remove the current prohibition of dryweather discharges of wastewater to surface waters because the prohibition would unintentionally restrict urban waste water reuse. It is well known that runoff from urban areas, including lawns, parks, median strips and the like is a major contributor to downstream pollution. Irrigation with tertiary-treated wastewater will either directly feed this pollution by runoff during irrigation or by rainfall runoff redistribution of contaminants stored in lawn soils and plant materials. Removal of the prohibition would eliminate legal control of this source of pollution, whether caused by urban irrigation or any other of the intended targets of the prohibition. PEER strongly recommends against this action.

Sincerely,



Dr. Howard Wilshire
Board Chairman
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