

RRWPC
Russian River Watershed Protection Committee

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December 22, 2008

Via Electronic Mail: commentletters@waterboards.ca.gov

Jeanine Townsend
Clerk to the Board, Executive Office
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Re: State Water Recycling Policy

Dear Ms. Townsend:

About RRWPC...

I am writing on behalf of Russian River Watershed Protection Committee (RRWPC), a California nonprofit corporation in existence since 1980. We represent property owners, tourists, recreationists, business people, and most others who love the Russian River, 80 miles north of San Francisco. We have about 1500 people on our mailing list, and have also experienced extensive support from numerous others who love and cherish our river and its ecosystem.

RRWPC has tracked wastewater and water quality issues in the lower Russian River and its tributaries for all those years. We have especially focused on Santa Rosa's wastewater system and its impact on the Laguna de Santa Rosa and Russian River since its huge illegal 800 million gallon spill of 1985. We have watched the Laguna de Santa Rosa degrade extensively over that period, even while the City greatly upgraded and improved their treatment and discharge systems.

We recognize that the degradation is not solely caused by Santa Rosa's wastewater, but most is caused by discharges in conjunction with upstream urban activities in (and runoff from) Santa Rosa, Rohnert Park, and Cotati. There are also dairies and some natural causes contributing to the problems.

Over the years, RRWPC played a significant role in the listing of the Laguna on the 303(d) list for its impairment by numerous pollutants including dissolved oxygen, nitrogen, phosphorus, temperature, sediments, and mercury. We are not scientists or lawyers, but rather persistent citizen advocates who have won extensive acknowledgment for our work and have joined forces at one time or another with most Sonoma County environmental groups concerned about water issues.

Santa Rosa's interest in Recycled Water Policy...

We have provided a significant amount of commentary to the Regional Board and discussed our concerns with them about this issue. We know that the City of Santa Rosa has been putting extensive pressure on the State to come up with a Basin Plan Amendment that allows for "incidental runoff".

Santa Rosa has been planning an urban recycled water project for about six years now and have stated numerous times that they won't offset potable water supplies without the Basin Plan "incidental runoff" provision. The City has paid State Lobbyist, Craig Johns, about \$1,000,000 over the last six years or so to help them to accomplish this goal. The proposed North Coast Basin Plan Amendment, which alters the Summer Discharge Prohibition by allowing "incidental runoff" is now out for public review. We will be commenting extensively on that as well.

The City has written a detailed plan for managing wastewater irrigation. There are many specific protections contained in it. But there are enormous limitations as well. For example, they will not institute significant penalties for repeat offenders or cut them off from the wastewater supply. We have heard some city water users brag that they use 70,000 gallons a month and they are willing to pay the price. To our knowledge, the City takes their money.

When push comes to shove, the City has been upfront about admitting that they know over-irrigation will occur, and they don't want to be subject to the possibility of citizen lawsuits because of it. This is an outright admission that they can't control the problem and they want to function with impunity since no one is going to file a lawsuit over a broken sprinkler head. In addition we are extremely skeptical that the promoted controls will be carefully monitored and that "accidents" will probably be a common occurrence. Regional Board staff will not have the time to carefully monitor and the "fox will be guarding the chicken house". (One City staffer admitted to me privately that the business park across from Santa Rosa's Utility Building over-irrigates all the time.)

We recommend that this reuse policy, should it move forward, require the establishment of an independent "water cop" monitoring program wherever "incidental runoff" is allowed and that severe penalties, including cut offs, be established for repeat offenders. This program can be self-supporting with graduating penalties, separate from water charges, imposed on water wasters. Most citizens didn't mind the program and even called in with "tips" about people who were careless. We also recommend that generous set backs from

creeks and streams of 200' be established to assure most runoff incidents won't make it to the surface water.

Lack of Adequate "incidental runoff" Definition....

One of our greatest concerns is the lack of adequate specificity in defining "incidental runoff". The refusal to state a specific amount in the definition, or the method of determining that amount is very problematic. The North Coast Board's proposed MS4 Permit suggests that 100 gallons is the point where a minor spill becomes a significant one and comes under different guidelines. Nowhere is such an amount suggested here. In light of people's propensity to carelessness, including wastewater managers themselves, we can't imagine how this policy is going to work in the real world.

This policy also makes no attempt to define the cumulative impacts of multiple runoff incidents. Who will make the determination as to whether a spill is truly incidental and what would prevent those responsible from miss-communicating the extent of the problem? I don't believe this program would work without an independent program of water "cops".

Alternatives to Policy....

RRWPC has major concerns about implementation of the Water Recycling Policy. We recognize the very hard times the State is experiencing in regards to adequate water supply and that this policy is an attempt to develop a standardized approach to address that concern. The policy clearly conveys the urgency with which the State views this need and we sympathize with those communities that are facing the greatest shortfalls. Nevertheless, we believe that the implementation of widespread reuse of wastewater, with what we believe are inadequate protections of all beneficial uses, is a grave mistake.

We appreciate that Regional Boards have been given the authority to impose more stringent requirements on local, site-specific projects. Nevertheless, we are concerned that the North Coast Regional Board lost about 50 staff people in the last few years and their budget has been cut to the bone. We seriously doubt that they can accomplish all the protections of beneficial uses that are promised in this Policy. We are also very concerned that this policy nurtures the idea, through the renaming of wastewater as recycled water, thereby conveying the impression that wastewater is entirely safe.

In 2007, Sonoma County water supplies were so low that the Sonoma County Water Agency called for stringent conservation efforts. They were particularly concerned about the irrigation issue and strongly pushed conventional conservation goals (i.e. water in early morning and late afternoon, do not waste water with over-irrigation, repair leaks, etc.). People began noticing who had the super green lawns. There was a call to use drought resistant landscaping. Water cops turned people in. Enormous savings occurred. The impetus of strict conservation should be promoted as an everyday value and not something that only happens in an emergency.

Soon things went back to normal. On various occasions we have even seen irrigation puddles in front of the administration building of the wastewater treatment plant and in front of their Utilities Offices. We have pictures of extensive over-irrigation in front of the North Coast Regional Board. We discussed this situation and others extensively in our letter to the Board on September 1, 2008. We resubmit that letter here for the record and would like it responded to as part of these comments.

Water Recycling Alternatives...

We believe that there are other options and alternatives that can and should be more fully pursued before you allow "incidental runoff" and cause widespread wastewater irrigation use to be pursued with great vigor. We wonder why the State doesn't get a handle on agricultural water use, including over-use? We question why rural property owners don't have to pay for the use of the water and the restoration of habitat that should be partly their responsibility? Why doesn't the State regulate all water use, including groundwater, and stop the massive illegal appropriations that are said to occur? While it may seem as though the recycling of wastewater is a good idea when we know so little about its effects, how much wiser would we be to use what we have much more judiciously in the first place?

In our earlier comments we described one alternative that, to our knowledge, no one has ever proposed. Significant water savings can be realized by fixing leaky sewer pipes. RRWPC examined the flow records of eight wastewater dischargers in the Russian River and discovered that there is a wide disparity between summer and winter flows indicating a great deal of infiltration and inflow into treatment systems. We studied the data between 1995 and 2007 of these dischargers and discovered that an average of 1.5 billion gallons of rain water a year leaks into Santa Rosa's wastewater system alone, forcing them to treat and dispose of the wastewater at great monetary expense, great energy usage, as well as damage to the environment from known and unknown pollutants.

The smaller towns of Ukiah, Cloverdale, Healdsburg, Windsor, Forestville, and Russian River Area, lost about 7 billion gallons combined over the 12-year period. That comes to about 584 million gallons of water lost by small communities in our area every year. Combined with Santa Rosa, that accounts for a loss of about 2 billion gallons a year of potable water in the area from Ukiah to Guerneville, and represents 25% of the water rights increase sought for the last ten years by the Sonoma County Water Agency. How much water and energy could be saved Statewide if everyone maintained their sewage infrastructure, which they should do anyway? Changing focus this way makes sense from the perspective of water-savings, pollution-prevention, and energy.

We also note that the Policy alludes to leaky water pipe repair. Some of our local small communities lose as much as 15% a year. Has anyone done a study of potential savings that could be realized through an infrastructure repair

program? Instead of promoting the reuse of wastewater that may contain numerous unregulated contaminants, it would be wiser to invest in maintenance of existing hardware. That would also save a lot of energy and would be a far more environmentally safe way to stretch our water supplies and avoid the possibility of contamination of our rivers and streams.

Our deep concern about the extensive reuse of wastewater in an urban environment evolves from the burgeoning amounts of information coming forward that indicate widespread species' impairment and even extirpation resulting from unregulated toxins, some of which are known, but many that are not. While there are upwards of 80,000 chemicals available in the market place, and grow in numbers every day, our regulatory process can't keep up. Only 126 toxins are currently regulated in a meaningful way. We have no idea what problems many of these unregulated substances create, at what amounts, or how they bio-accumulate and interact with one another.

Recent Articles & Studies on Species Loss & Endocrine Disruption:

- Aug. 3, 2008: Three important scientists stated: *"There is growing recognition that the diversity of life on earth, including the variety of genes, species and ecosystems, is an irreplaceable natural heritage crucial to human well-being and sustainable development. There is also clear scientific evidence that we are on the verge of a major biodiversity crisis. Virtually all aspects of biodiversity are in steep decline and a large number of populations and species are likely to become extinct this century."*

And further, "Scientists estimate that 12% of all birds, 23% of mammals, 24% of conifers, 33% of amphibians and more than half of all palm trees are threatened with imminent extinction. Climate change alone could lead to the further extinction of between 15% and 37% of all species by the end of the century." Finally they say, "Everywhere we look, we are losing the fabric of life, it's a major crisis."

(G. Mace of UK Institute of Zoology, Robert Watson from the World Bank, and Peter Raven of the Missouri Botanical Garden state, in the publication, "Nature"),

How does this policy protect threatened and endangered species in light of unknown and unregulated chemicals in the wastewater?

- Winter, 2008 issue of "The Drift", put out by Californians for Alternative to Toxics (page 4): *"Seven decades of using pesticides to grow food has devastated populations worldwide of our traditional agricultural helpers, birds, bees, frogs, and bats. Although toxic chemicals have been implicated as a root cause in their slide towards oblivion, the chemicals continue to be pumped into the environment."* Incidental runoff may cause the unintended consequence of

allowing lawn chemicals to run off into waterways. What was considered in this regard during the formulation of the Policy? Why not prohibit wastewater irrigation on land that has been treated with pesticides? Also how would chemicals in reused wastewater and chemical applications on lawns interact with one another?

- August 3, 2008: “National Survey Reveals Biodiversity Crisis – Scientific Experts Believe We Are in Midst of Fastest Mass Extinction in Earth’s History”: “The American Museum of Natural History and Louis Harris and Associates, Inc., in conjunction with the opening of the Museum’s new Hall of Biodiversity, developed a nationwide survey titled Biodiversity in the Next Millennium.”

Highlights: *“Seven out of ten biologists believe that we are in the midst of a mass extinction of living things, and that this dramatic loss of species poses a major threat to human existence in the next century.” “This mass extinction is the fastest in Earth’s 4.5 billion-year history and, unlike prior extinctions, is mainly the result of human activity and not of natural phenomena.” “Scientists rate biodiversity loss as a more serious environmental problem than the depletion of the ozone layer, global warming, or pollution and contamination.”* (emphasis added) Also, one result will be, *“Destruction of the natural systems that purify the world’s air and water.”* How might irrigated lands be affected by global warming? Would any chemical changes take place that could impact affected species?

- December, 2008: Chemtrust: *“Effects of Pollutants on the Reproductive Health of Male Vertebrate Wildlife: Males Under Threat”* (page 4), *“Many wildlife species are now reported to be affected by pollutants, and similarities can be seen in the effects recorded. The target sites, which are the focus of this review, include male developmental pathways. It is clear that structural intersex features, including effects on the male reproductive tract, result from exposure before birth. On the other hand, abnormal secretion of the egg yolk precursor protein, VTG, in male fish, birds, and reptiles, can result from later adult-life exposure to feminizing pollutants. VTG is normally produced in females, and when found in males in elevated concentrations it confirms the presence of sex hormone disrupting contaminants in the environment, and indicates feminisation of the male. Reduced reproduction has also been included, although it may result from female or male reproductive impairment, or from lack of viability of the offspring.”* Would the State be willing to test for signs of feminization in areas where wastewater is applied? Could the policy be suspended in areas testing positive for endocrine disruption?
- March, 2008: AP Study on drugs in water supplies: (AP story by Jeff Donn, Martha Mendoza, and Justin Pritchard): *“A vast array of pharmaceuticals—including antibiotics, anti-convulsants, mood stabilizers and sex hormones—have been found in the drinking water supplies of at least 41 million Americans, an associate Press investigation shows.”* During a five-month inquiry, AP

researchers found that drugs were detected in the water supplies of 24 major metropolitan areas.

In response to the question of how drugs get in the water, the article states, *“(it)...is flushed down the toilet. The wastewater is treated before it is discharged into reservoirs, rivers, or lakes. Then, some of the water is cleansed again at drinking water treatment plants and piped to consumers. But most treatments do not remove all drug residue.”* It seems as though it would be valuable to test any wastewater to be irrigated for endocrine disruptors and not allow any irrigation with waters testing positive. Would the State be willing to make that part of this policy?

The study found that many water systems do not test for pharmaceuticals; but only a few that tested had negative results. Pharmaceuticals were also found in ground water. *“Some drugs, including widely used cholesterol fighters, tranquilizers and anti-epileptic medications, resist modern drinking water and wastewater treatment processes. Plus, the EPA says there are no sewage treatment systems specifically engineered to remove pharmaceuticals.”* At a conference last summer the director of environmental technology for Merck & Co. Inc., Mary Buzby stated, *“There’s no doubt about it, pharmaceuticals are being detected in the environment and there is genuine concern that these compounds, in the small concentrations that they’re at, could be causing impacts to human health or to aquatic organisms.”* (This is particularly meaningful coming from a drug company representative.)

- Feb. 17, 2008: LA Times: “Study finds human medicines altering marine biology”, by Kenneth R. Weiss: *“Sewage treatment plants in Southern California are failing to remove hormones and hormone-altering chemicals from water that gets flushed into the coastal ocean waters, according to the results of a study released Saturday.”* *“(The Study) confirms the findings of smaller pilot studies from 2005 that discovered male fish in the ocean were developing female characteristics, and broadened the scope of the earlier studies by looking at an array of man-made contaminants in widespread tests of seawater, seafloor sediment and hundreds of fish caught off Los Angeles, Orange and San Diego counties. The results, outlined by a Southern California toxicologist at a conference in Boston, reveal that a veritable drugstore of pharmaceuticals and beauty products, flame retardants and plastic additives are ending up in the ocean and appear to be working their way up the marine food chain.”* And scientists add, *“Dilution is not the solution for some of these newer compounds, said Steven Bay, a toxicologist....”* The big issue is whether endocrine disruptors are ending up in the sediments and being reintroduced into the water column and whether these pollutants are situated in the estuary and ocean as well.
- July 10, 2007: “Down the Drain: Sources of Hormone-Disrupting Chemicals in San Francisco Bay” Environmental Working Group: *“95% of wastewater samples show widespread use of chemicals”* *“Advances in*

technology allow an unprecedented look at chemical contaminants in water bodies throughout the United States. In 2002, the first nationwide study of man-made chemicals and hormones in 139 streams revealed that 80% of streams tested were contaminated. (Kolpin 2002) Several of the chemicals examined are known or suspected of disrupting the hormone systems of animals and people. Of these, only a small fraction have been regulated at all, much less tested for toxicity, persistence in the environment, or other harmful characteristics, such as hormone disruption. Some of the same unregulated, widely-used, hormone-disrupting chemicals have been detected at trace levels in the San Francisco Bay (Oros 2002)"

"Damage to the reproductive health of vulnerable fish populations may result in detrimental consequences to local fisheries and aquatic ecosystems; in addition, there is concern that people could become further exposed to hormone-disrupting chemicals by eating contaminated fish (Houghton 2007)" "Analysis of 19 wastewater samples for 3 hormone-disrupting substances reveals widespread contamination."

- Dec. 16. 2008: "Ocean Scientists Urge New Administration and Congress for "Bailout" of Ocean Ecosystems and Economies", (from website: Oceana.org): Summary of main concerns by scientists about ocean conditions included over-fishing, climate change, nutrient and other pollution and synergistic effects. *"Efforts to reduce nutrient pollution in the United States have been only modestly successful, not only because of inadequate controls on emissions but also because degraded ecosystems resist recovery....Although scientists have observed progress in reducing toxic pollution, contaminants from human activities are distributed and persist over wide areas of the ocean, often resulting in subtle but significant effects on marine animals, even in remote polar regions."*
- Dec. 7, 2008: The most shocking to humans and perhaps the most attention getting; "It's Official: Men Really Are the Weaker Sex" by Geoffrey Lean (based on CHEMTrust report by Gwynne Lyons: "EFFECTS OF POLLUTANTS ON THE REPRODUCTIVE HEALTH OF MALE VERTEBRATE WILDLIFE" The Independent (London, U.K.) The article quotes the author as saying, *"Males of species from each of the main classes of vertebrate animals (including bony fish, amphibians, reptiles, birds and mammals) have been affected by chemicals in the environment...."*

Feminization of the males of numerous vertebrate species is now a widespread occurrence. All vertebrates have similar sex hormone receptors, which have been conserved in evolution. Therefore, observations in one species may serve to highlight pollution issues of concern for other vertebrates, including humans....

Fish, it says are particularly affected by pollutants as they are immersed in them when they swim in contaminated water, taking them in not just in their food but through their gills and skin. They were among the first to show widespread gender-bending effects. Half the male fish in British lowland rivers have been found to be

developing eggs in their testes....more than three quarters of sewage works have been found also to be discharging demasculinising man-made chemicals.” (Note: Europe is way ahead of the USA in testing for these emerging contaminants. In the US, most sewage treatment plants really don’t want to know.)

And more alarming....”And a study at Rotterdam’s Erasmus University showed that boys whose mothers had been exposed to PCBs grew up wanting to play with dolls and tea sets rather than with traditionally male toys.”

- For those who think that tiny amounts won’t cause harm....

May 22, 2007: “Estrogen threatens minnow manhood by Marin Mittelstaedt, “Environmental Reporter” It states, “*Exposing fish to tiny doses of the active ingredient in the pill (synthetic estrogen), amounts little more than a whiff of estrogen, started turning male fish into females. Instead of sperm, they started developing eggs. Instead of looking like males, they became indistinguishable from females. Within a year of exposure, the minnow population began to crash. Within a few years, the fish, which at one time teemed in the lake, had practically vanished.*” The amount of estrogen used was the same amount found in sewage treatment plants in Canada.

- Finally, Nov. 21, 2008: “SOS: California’s Native Fish Crisis, Prepared by Cal Trout and based on report by Dr. Peter B. Moyle, Dr. Joshua A. Israel, and Sabra E. Purdy. The introduction states: “*As detailed in the pages that follow, what’s been suspected for years we now know for certain---California’s native salmon, steelhead and trout are in unprecedented decline and teetering towards the brink of extinction. The collision of climate change with decades of water mismanagement have brought us to where we are today...If present trends continue, 65% of our native salmonid species will be extinct within 50-100 years, with some species—such as coho, chum, pink salmon and summer steelhead—disappearing much sooner.*” We include the pages describing the status of the three listed salmonid species listed for the Russian River: California Coast Coho Salmon and Chinook Salmon and Steelhead.

One of the solutions provided in this Policy to address the issue of emerging contaminants is to establish an ADVISORY scientific panel. We have had too many experiences with scientists who sell themselves to the establishment willing to provide whatever conclusions the politicians want. If you let a true scientist select the panel; someone who has been working in the field for a very long time and has a spotless reputation (like Lou Guillette), perhaps then it might be a partial and temporary solution. But actually things are degrading so fast, we don’t have enough time to wait for new regulations to cure this dire problem. At the very least, we need to not make the problem worse, which this policy is very likely to do. (Sorry to be so harsh, but that’s my opinion based on all the information I’ve received in the last several years. Time is running out!) It would be far more valuable to focus on conservation and infrastructure repair.

Title 22 and Section 7 Consultation (low flows)...

In general, we are very concerned about the reliance on Title 22 for asserting that water quality objectives will be met. There appears to be an underlying assumption that "incidental runoff" will not end up in our rivers and streams although no set back limits are required and few means of assurance are defined. In fact, it is totally unclear what amount of runoff is under consideration here. Under most circumstances, we find Title 22 very limited for meeting human health needs and totally inadequate for addressing wildlife and aquatic life concerns. It focuses mostly on acute diseases and does little for the rest.

There seems to be a logical disconnect between allowing "incidental runoff" and guaranteeing that runoff won't end up in surface water. We totally support Howard Wiltshire's comments in this regard. We fail to see how this policy is protective (other than through assertion) of all beneficial uses, when in fact, the waterways in proximity to the areas of use are already extremely degraded and are likely to become more so. This policy simply does not demonstrate how those uses will be protected.

If it is assumed that there will be no wastewater discharge (recycled water IS wastewater, not potable water), then it becomes irrelevant to talk about stream flow, but we believe that would be a grave omission. One important issue for the Russian River is the Section 7 Consultation under the Endangered Species Act between the National Marine Fisheries Service and Sonoma County Water Agency and Army Corps of Engineers. A Biological Opinion was recently released and it calls for significant flow changes under Decision 1610, which will come before the State Board sometime in the next two years. The Opinion calls for a permanent lowering of summer Russian River flows of at least a third at the Hacienda Bridge in the lower river (Other flow changes will be proposed as well, but this is the one that has the greatest impact on downstream uses.)

The goal of NMFS is to permanently close the mouth of the river in summer so as to improve breeding habitat in the estuary. We are concerned that the estuary may or has become a sink for all kinds of upstream pollution and will create unanticipated problems for not only fish, but also birds, marine mammals and other species. (The recently released BO can be found at the Sonoma County Water Agency's website.) Already dissolved oxygen and nutrient problems have been noted on the estuary bottom.

So we wonder how possible cumulative "incidental runoff" incidents would fare in streams that have minimal flows? If you add this to the prospect of global warming, it appears we can have a serious problem, even if the "accidents" are small in scale. Many of the studies noted above mentioned that with endocrine disruptors, it doesn't take much to cause toxicity and the conventional wisdom that the "dose makes the poison" does not apply here. Furthermore, as Howard states, *"Little is known of the complex processes of transport and fate of most pollutants in treated wastewater."* I would add that even less is known about what pollutants are picked up by the runoff on its way to wherever it goes.

But wait, this is not all. The Sonoma County Water Agency recently (in the last two weeks) released their 3000 page EIR for their long-range water supply project (also available at their website). We have not had the time to examine it yet, but we ask that whoever responds to these comments examine the interrelationship between this new policy, the Biological Opinion, and the new Water Supply EIR. We are looking at numerous major policy and/or management changes for the Russian River and NO ONE is looking at how they all interact with one another.

Anti-degradation Policy....

Howard Wiltshire clearly pointed out the weaknesses of the Anti-Degradation portions of this policy, which we strongly support. I recently received a copy of the Environmental Law Foundations over 40 pages of comments on the proposed Revision of the State's Antidegradation Implementation Guidelines dated Dec. 17, 2008, and written on behalf of 25 environmental and other groups. The commentary challenges the decision process of Regional Boards on "best professional judgment" in the absence of standards. It questions the absence of objective standards on which to base decision-making. Such limitations have serious implications for the basic assumptions in the proposed Recycled Water Policy.

It also comments on the fact that "The Guidance Improperly Ignores Cumulative Impacts", a concern we have already raised. Another section deals with, "The Guidance Improperly Allows for a Sliding Water Quality Baseline". In fact, the Laguna de Santa Rosa and its tributaries are one of the most impaired water bodies in the North Coast and subject to all kinds of nutrient and other pollution, partially a result of irrigation practices in the Rohnert Park area. There has been no attempt to control runoff in that area, even while the invasive specie *Ludwegia* is totally blocking the stream channel. Attempts to remove and control the invasive were partially successful for a brief time. When the removal project ran out of funds (after about \$2 million was spent), the problem came back full force and perhaps worse than what it had been before. (see pictures)

There is really nothing in the proposed Policy that assures that things won't get worse under this policy. The Antidegradation Policy is supposed to improve clean water, not provide language that actually allows for exacerbation of the problem. We also wonder how this Policy will interface with the new General Permit, final version not yet released. The Regional Board is now looking at the General Permit, the MS4 Permit that includes non storm water discharges, and the Basin Plan Amendment for "Low Threat" discharges that also includes "incidental runoff". It is very unclear how these documents will all relate to one another and also the other documents recently released by SCWA.

We have not had a great deal of time to study the Environmental Law Foundation's comments on the Antidegradation Policy, but we hope that you will address all the issues raised there in reference to the proposed Recycled

Water Policy. We ask that more time be allowed for everyone to look at all these documents synergistically, so we actually move towards solving our complex water needs, instead of setting future generations up for disaster. We are so concerned that the people writing these policies are sitting in a cubicle somewhere completely out of touch with actual natural processes.

RRWPC strongly supports the comments of Linda Sheehan in her letters of March 27, 2007, Oct. 26, 2007, and June 26, 2008 (on "Statewide General Permit for Landscape Irrigation Uses of Recycled Water"). We also will quote from and include here, the Dec. 17, 2008 letter by the Environmental Law Foundation on the States revision of the "Anti-degradation Implementation Guidelines". Finally, we are in complete agreement with the comments of all of the above and also Howard Wiltshire for PEER and Jane Nielson for SWIG. All of these contributions are brilliant and go far beyond our expertise in identifying the problem of reusing wastewater from a legal and scientific perspective. We urge your Board to thoroughly respond to all contributions.

RRWPC will try to include all attachments with this letter. We will also send you a hard copy of the letter and will include any attachments we could not include electronically.

Sincerely,

Brenda Adelman: Chair

Russian River Watershed Protection Committee

CC: Cat Kuhlman: North Coast Regional Board

PS: I appreciate that the Policy includes a separate section on nutrient/salt policy. In truth, I share Howard Wiltshire's concerns about its adequacy. I have included the Final Report on the Ludwigia Control Project which includes pictures taken after project completion. I have also included a picture of the regrowth this year taken from the same location as the pictures in the Report. As you can see, it's as though the project did not even occur.