



March 6, 2008

Tam Doduc, Chair and Members
State Water Resources Control Board
1001 I Street
Sacramento, California 95814

VIA ELECTRONIC MAIL

Re: March 18, 2007 SWRCB Meeting, Agenda Item #13: Proposed
Recycled Water Policy

Dear Chair Doduc and State Board Members:

On behalf of our 1400 members, we would like to comment on the State Water Resource Control Board's (Water Board) Recycled Water Policy. We support the need to safely increase the amount of recycled water reuse in California to meet our present and growing water needs as long as existing surface and groundwater quality is protected against any degradation. We have submitted extensive comments individually and as part of the California Coastkeeper Alliance, met with Water Board members and industry to explain our concerns with the policy. The current draft of the recycled water policy does not adequately protect water quality consistent with state and federal law and does not address all the relevant issues pertaining to safe recycled water reuse that are needed to give certainty to public agencies wanting to implement recycled water projects.

We urge you to delay implementation of the Recycled Water Policy and instead facilitate a stakeholder process to explore all issues and develop a clear, complete and workable policy and implementation plan. This type of process has not been undertaken and is the best alternative to develop a workable recycled water policy that strongly protects water quality and meets the challenge of safely increased recycled water use to meet the 1 million acre-feet-per year goal set by the state.

We appreciate your consideration and hope for a new process to create the recycled water policy California needs to meet water quality and quantity challenges.

Sincerely,

Don McEnhill
Russian Riverkeeper

Board of Directors

Layne Friedrich, Esq
President

Virginia Strom-Martin

Brian Hines

Fred Euphrat, PhD

Doug Lipton, PhD

Staff

Don McEnhill Jr.
Riverkeeper

Eve Monrad
Program Assistant

Victoria Wikle
Park Project Director

Russian Riverkeeper
PO Box 1335
Healdsburg, CA 95448
707.433.1958
Fx 433.1989
www.russianriverkeeper.org
info@russianriverkeeper.org



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From: <rrkeeper@sonic.net>
To: <tdoduc@waterboards.ca.gov>, <gwolff@waterboards.ca.gov>, <fweber@waterboards.ca.gov>
Date: Thu, Mar 6, 2008 10:26 AM
Subject: Recycled Water Policy comments

Dear Chair Doduc and Members of the Board,

I will not be able to attend the March 18th hearing due to a previously scheduled project we are working on that day. Since Russian Riverkeeper has been very engaged in the Recycled Water Policy process I wanted to pass along the attached comments before the Board meeting.

We continue to believe that the policy falls short of a comprehensive policy for recycled water that addresses all Federal and State water quality mandates and provides the necessary certainty to public agencies to allow them to implement projects. In the interest of ensuring protection to existing surface and groundwater quality, providing clear implementation policies to aide public agencies developing projects and gaining support across industry and conservation communities we urge you to facilitate a stakeholder process to identify all key issues and work towards a policy that we ensure the state meets the mandate to increase recycled water useage to one million acre feet per year.

Sincerely,
Don McEnhill
Riverkeeper

Don McEnhill
Russian Riverkeeper
PO Box 1335
Healdsburg, CA 95448
ph: 707-433-1958
fx: 707-433-1989
cel: 707-217-4762
www.russianriverkeeper.org

Member of the worldwide Waterkeeper Alliance & California Coastkeeper Alliance. Learn more at waterkeeper.org or cacoastkeeper.org

"If you can find a path with no obstacles,
it probably doesn't lead anywhere."
—Frank A. Clark

CC: <commentletters@waterboards.ca.gov>