

October 9, 2012

STATE WATER RESOURCES CONTROL BOARD  
JEANINE TOWNSEND: CLERK OF THE BOARD  
1001 I ST: 24<sup>TH</sup> FLOOR  
SACRAMENTO, CA 95814  
Email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)



Dear Chairman Hoppin and Board Members,

On behalf of the Clean Water Coalition of Northern Sonoma County, we appreciate the opportunity to comment on the *Proposed Amendment to the Recycled Water Policy to Incorporate Monitoring Requirements for Constituents of Emerging Concern* (Amendment). The Clean Water Coalition of Northern Sonoma County (CWC), founded in 2007, represents citizens who live in the Alexander Valley, Dry Creek watershed or Middle Reach of the Russian River, and who depend on high-quality groundwater supplies for drinking, domestic uses and agriculture. Member organizations include the Alexander Valley Association, Bishops Ranch, the Dry Creek Valley Association, the Russian Riverkeeper, the Soda Rock Neighborhood Association, and the Westside Association to Save Agriculture.

We strongly object to the failure of this amendment to require monitoring of CECs for recycled water used for landscape irrigation. The statement that this monitoring is not required due to the low risk for ingestion of the water is far too broad and far reaching. Contaminants contained in recycled water used in landscape irrigation can enter drinking water sources via run off into surface waters or via percolation to groundwater. The Policy states that Regional Water Boards can make determinations that unusual circumstances apply in recycled water projects (i.e. “unique site-specific conditions such as where recycled water is proposed to be used for irrigation over high transmissivity soils over a shallow high quality groundwater aquifer”). In such cases the Regional Water Board has discretion to require additional studies and conditions to ensure that groundwater contamination does not occur. It must be very clear that this discretion includes the right to require monitoring of CECs for landscape irrigation projects.

It is now well documented the some CECs, especially endocrine disrupting chemicals, can have serious impacts on aquatic life and humans at extremely low doses. It is time for the state board to take seriously the comments,

scientific understanding and references provided by Dr Laura Vandenberg of Tufts University in her comment letter concerning this Amendment to the Recycled Water Policy submitted to you on June 27, 2012. She specifically challenges the assertion that monitoring of individual CECs is not necessary for recycled water used for landscape irrigation and states that the concepts of low dose effects and non-monotonic responses are not at the fringe of science and must be considered when regulating uses of recycled water.

Further we strongly endorse the more detailed recommendations concerning the need to significantly strengthen regulation of CECs in use of recycled water contained in the comment letter concerning this Amendment to the Recycled Policy submitted to the Board on October 9, 2012 by the California Coastkeeper Alliance.

Respectfully Submitted,

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