



Northern California River Watch PO Box 817 Sebastopol CA 95472 [www.ncriverwatch.org](http://www.ncriverwatch.org)

June, 2012

Senator Noreen Evans  
State Capitol Room 4032  
Sacramento, CA 95814-4900



Dear Senator Evans:

We are very concerned about the implications of the passage of AB 2398.

The concern regards the loose definition of “incidental”, the large amounts of “incidental” runoff allowed before appropriate reporting takes place, and the general problem of pollutants residing in treated wastewater that has not been dealt with by most treatment plants—endocrine disrupting chemicals. This situation is a general problem wherever it is allowed, but in the lower Russian River, it is exacerbated by the mandated low flows in the lower section of the river.

We request that tertiary wastewater used for irrigation continue to be regulated through the Regional Boards’ reclamation permits and not declassified as a waste. This is especially important not only to protect human health, but also the varied aquatic life exposed to the discharged wastewater on a continual basis.

We request that incidental runoff be defined as truly “incidental” and that the 50,000 limit for reporting runoff be taken out of this bill along with the 1000 gallon limit for spills of secondary wastewater. All spills should be reported immediately. We also recommend that all irrigation with wastewater should be by drip and not spray to avoid runoff.

We request that the State fully consider all information about the impacts of low dose exposure to endocrine disrupting chemicals. These chemicals have been found to cause significant health impacts to humans and wildlife at extremely low doses and yet the State is amending the Recycled Water Policy to avoid monitoring of tertiary wastewater for endocrine disruptors.

Finally, the state needs to consider that herbicides and pesticides will run off with the wastewater and possibly cause serious harm in the summer when human use is high, flows are low, and the river system is far more vulnerable to bio-accumulating toxic substances.

Sincerely,

Larry Hanson  
Manager, NCRW