



Jeanine Townsend, Clerk to the Board
State Water Resources Control Board

Friends of the North Fork is opposes the amendment and continues to oppose the policy in question and the manner in which it is being implemented. The amendment proposes to repeat and reinforce as well as loosen the existing policy.

The State of California needs a plan to address contaminants of emerging concern. With Board CEC planning missing in action, the proposal continues the necessity for the public to do its best to make up for this Board failure.

Instead of a plan for moving ahead, we have the delay and misdirection that is embodied in the misnamed Recycled Water Policy that proposes to undermine and ignore the applicability to the policy to authorities the state and regional boards exercise under the federal Clean Water Act and the California Porter-Cologne Water Quality Control Act.

The vision of the Water Reuse Association is, "To be the world's leader of new water sources, advocating the right water for the right use." The key trouble with this is that reused municipal wastewater is not new water. It is water already in use. The policy is like a virus being promoted in a manner proposed to infect the state's water programs. The association's vision is, in effect, to capture water from existing uses while -- no one's looking. It's an effort that screens what's going on and a kind of reversion to a wild west philosophy clothed in green garb. And the state is moving through the policy to implement this vision.

Here's how:

1. The State Water Resources Control Board recycled water policy adopted early 2009 is not based on a meaningful review of applicable science. Compounding this problem is that it appears that many if not most Board members who may apply engineering and other disciplines are may not be conversant in the necessary science.
2. It fails to address that anti-biotic resistant pathogens are found municipal wastewater distributed from sewer plants thereby creating potential dangers including to users of school fields irrigated with it.
3. It has completely failed to take into consideration the impact of hospital wastes on recycled sewer plant effluent.
4. It has completely failed to take into account the presence or absence on sewer systems of Clean Water Act industrial pretreatment programs that regulate industries discharging

into sewer systems and define what is going into sewers from industries. When asked about stakeholder group consideration of industrial pretreatment, two water district attorneys touting the policy at a county bar meeting simply said that pretreatment was not considered.

5. It has ignored until "later" CEC impacts on rivers and lakes receiving treated sewage until reportedly earlier this year.

6. Water recycling and its policy takes or proposes to take water needed for wetlands.

7. Water recycling and its policy takes or proposes to take water needed for the Delta. Its ironic to us that first line of the policy mentions the Delta.

8. Water recycling and its policy takes or proposes to take water needed for established water rights,

9. Water recycling and its policy takes or proposes to take water needed for instream uses.

10. Water recycling and its policy takes or proposes to take water needed for salinity barriers.

10. The Board's CEC monitoring panel decided to ignore the need to monitor any CEC that did not have established testing protocols, which is most of them.

11. Recycled water injected into aquifers creates a chemical soup we are not ready to manage.

12. The greenwashing stakeholder group that voluntarily assembled itself to advise the Board was established by water districts and certain southern coastal groups and had no northern California grassroots groups working to protect fresh waters on it. Our group requested to be involved and was refused the ability to be on it or to go to its meetings because those attending "knew each other" and had worked on issues before in the southern region, though not one the same side. The Board urged the group forward and adopted the groups work and its exclusionary procedures unlike those of any regional and state water board stakeholder group we've been involved in.

13. Mandatory statewide reporting of water reuse is essential, but the Board has done only voluntary surveys. If we're not mistaken, past results listed potable water volumes. http://www.swrcb.ca.gov/water_issues/programs/grants_loans/water_recycling/munirec.shtml

14. Water recycling and its policy takes or proposes to take water needed for the state public trust doctrine.

15. Water recycling and its policy takes or proposes to take water needed for federal reserved water rights and federal public trust purposes.
16. It undermines the "dilution solution" to pollution that is relied on in many state and regional board actions.
17. It was not developed in conjunction with basin and other plans, and therefore leaves its integration with these plans in limbo.
18. Having become the basis for legislation while having no meaningful investigatory basis behind it's "water recycling" provisions, it contributes to misinformation and questionable lawmaking.
19. It was developed without input from applicable Board and Reigonal Board policy and program staff.
20. The recycling part of the policy was based on dusting off very old Board policies without bringing them up to date based on all of the work of intervening years,

Michael Garabedian, President
Friends of the North Fork (American River)
7143 Gardenvine Ave.
Citrus Heights CA 95621
916-719-7296