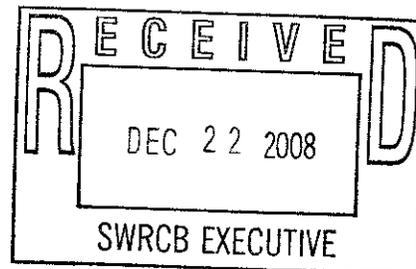


Public Comment
Recycled Water Policy
Deadline: 12/22/08 by 12 noon

From: "Edwin Wilson" <wilsondcva@earthlink.net>
To: commentletters@waterboards.ca.gov
Date: Mon, Dec 22, 2008 12:04 PM
Subject: 1/6/09 BOARD MEETING (RECYCLED WATER POLICY)

Edwin W. Wilson
President, DCVA
PO Box 1221
Healdsburg, CA 95448



December 22, 2008

State Water Resources Control Board

P.O. Box 100

Sacramento, CA 95812-0100

Re: Comment on Draft Staff Report and Certified Regulatory Program
Environmental Analysis For the SWRCB Water Recycling Policy

Gentlepersons:

On behalf of the Dry creek Valley Association, a California nonprofit Corporation, please consider the following comments:

1. Regarding the Anti-degradation issues, it would be a mistake to have a blanket rule that any proposed project that is consistent with the anti-degradation provisions of the plan be found to be in compliance with the anti-degradation policy. A project could be consistent with the anti-degradation policy and still clearly result in degradation to groundwater quality.
2. Referring to Section 17 of the environmental checklist (MANDATORY FINDINGS OF SIGNIFICANCE): the project clearly has the potential to degrade the quality of groundwater because of the fact that it is now recognized that waste water often contains constituents of emerging concern (CEC). That being the case, an EIR is required under CEQA. The appointment of a panel of scientists to study the problem does not solve the problem. There

are obviously many, many CEC's now in wastewater. It is necessary to at the very least discuss, and if possible, mitigate the environmental effects of those CEC's which are at the best understood at this time.

Respectfully submitted,

Edwin W. Wilson

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