

**From:** Michael Garabedian <mikeg@gvn.net>  
**To:** commentletters@waterboards.ca.gov  
**Date:** Mon, Dec 22, 2008 12:00 PM  
**Subject:** Comment letter - Proposed Recycled Water Policy

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

To Jeanine Townsend, Clerk of the Board  
Executive Office, , State Water Resources Control Board  
P.O. Box 100  
Sacramento, California 95812-0100

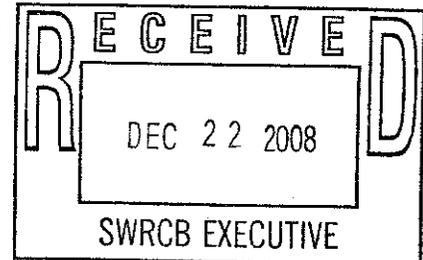
Re: CEC's and proposed Recycled Water Policy

Dear Ms. Townsend:

The November 4, 2008 Draft Recycled Water Policy is significantly improved.

Friends of the North Fork suggests that the Board continue to build on this effort.

1. The policy should summarize and an appendix should contain a summary with citations of the existing local, state and national regulatory framework for CECs.
2. The Board should obtain existing sampling and testing data from water and other agencies who have ben testing for CECs. Two years ago on October 22, 2006, water agencies present at the Pharmaceutical Residuals in Groundwater workshop at the annual State Bar Environmental Law Conference stated that they were testing their waters to determine the nature and extent of CECs. Water districts know this information, the public should know it, and the Board should have it before embarking on this revised policy.
3. The Board should conduct its own spot sampling around the state for CEC's, enough so that it has a minimally adequate idea of the relationship of CEC presence in our waters and the proposed policy.
4. CEC policy consideration should include rivers, lakes and septic tank areas. It is mistakenly piecemeal to begin in the policy to address groundwater impacts without looking at the key wastewater CEC issues involving surface and surface-groundwater relationships. Friends have members who take their domestic water from a river that receives POTW waste water and other members who drink water from the American River Sacramento water intake facility.
5. CEC should be defined. The policy uses the term without adequate definition. Pharmaceuticals are but one component. Illegal chemicals such as illegal drugs and consumer chemicals such as caffeine should be included.
6. A survey of the 50 states and of California counties, cities and districts should be undertaken to determine what states and our local agencies are doing to address the CEC problem.
7. The policy should clearly identify and explain research needs.



8. The policy should include a public education and information effort including public service announcements.
9. The policy should include development of a state CEC plan and an outline of the steps to develop it.
10. The policy should include developing recommendations to the Governor for joint agency coordination and action on CEC's and for an executive order.
11. The policy should include consideration of the development of recommendations for state and national legislation.

The draft policy requires modification addressing these points: It repeatedly refers to implementation of state and federal water quality laws without saying what these laws and regulations are. This is not helpful or meaningful. Indeed, there may be so little attention to CEC's in existing law that the promise implement CEC regulation in this manner may be an empty, if not misleading, promise. The policy says that the environmental community has agreed to this policy. It refers to a letter that is not available. Both are misleading. We asked to be included in the stakeholder meetings, but our expression of interest was declined. The policy does not describe in Policy 10(a)(1) what the regulatory requirements for recycled water and how they are or will be developed.

The policy acknowledges that wastewater recycling may have an impact on the environment including water quality and on public health. An Environmental Impact Report should be prepared for this policy. The wastewater policy including its proposal to greatly increase wastewater recycling may have a significant potential negative impact on water, hydrology and water quality, biological resources including wildlife and fish, human health, utility and service system drinking water distribution and sewage treatment, and recreation.

Thank you for the opportunity to comment.

Sincerely,

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

CC: ginnes@waterboards.ca.gov