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Late 12:12 pm

Tam Doduc, Chair and Members
State Water Resources Control Board
1001 I Street
Sacramento, California 95814

VIA EMAIL: commentletters@waterboards.ca.gov

Re: Statewide Water Recycling Policy

Dear Chair Doduc and State Board Members:

I am writing on behalf of the 1400 members of Russian Riverkeeper about concerns over the proposed Statewide Water Recycling Policy as it does not appear to be adequately protect of beneficial uses in our watershed. Agricultural irrigation that works for Southern California or the Central Valley will have far different effects on more pristine North Coast Rivers, all treated water is not of the same quality, all soils and groundwater quality levels vary across the state. A blanket policy that accommodates reuse in one part of the state would likely ensure degradation in another part of the state where water quality is superior.

In the Russian River watershed several large alluvial valleys planted in wine grapes are slated for agricultural reuse of treated wastewater. Dry Creek, Russian River and Alexander Valleys contain large amounts of groundwater in the alluvial deposits where the water table is close to the surface and water drains towards Dry Creek or the Russian River.

Our concern is that even tertiary treated UV disinfected wastewater still contains a significant amount of soluable organic compounds that do not absorb onto particles and resist breakdown to microbes far more efficient than found in soils. Using treated water on a thin soil mantle that overlies shallow groundwater will over time degrade groundwater quality since the pollutants that pass through treatment would not stick to soils or breakdown from soil microbes. A good measure of untreated pollutants is Total Organic Carbon and with average concentrations in the 20-35mg/L range this accounts for potentially hundreds of un-identified compounds.

Using salt as a proxy for pollutants ignores emerging pollutants and pollutants with low ionic strength and we believe that groundwater degradation could occur even if salt levels are benign. In the Russian River watershed salts in groundwater are very low and allowing an increase in salts would degrade quality but also load other pollutants into our future water sources.

In many areas of the state the issue of groundwater quality threat from irrigation with treated wastewater is low due to treated water being of higher quality than groundwater or due to impermeable soil layers. In some area of the state surface waters are effluent dominated or have high percentages of effluent. In the Russian River and many other North Coast rivers summer discharge is prohibited and winter discharges compromise less than 5% of flow at any given time so summer irrigation with treated water can potentially degrade surface water quality due to alluvial valleys draining to streams.

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In summary a blanket policy and the current resolution before the board will not protect all beneficial uses across all regions and will result in this policy allowing degradation in areas of the state with high quality waters. We urge you to pull this from consideration today to allow for more deliberation in order to create a policy that rightly encourages needed resue across California but protects water quality across the state for current and future generations that depend on your stewardship.

Thank You for your consideration.

Sincerely,

Don McEnhill

Don McEnhill
Russian Riverkeeper

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