

From: "Martha Berthelsen" <martha@thewatershedproject.org>
To: <commentletters@waterboards.ca.gov>
Date: Fri, Jul 14, 2006 3:53 PM
Subject: comment letter -- chlorine policy

To the State Water Resources Control Board;
Celeste Cantu, Executive officer of the State Water Resources Control Board
Tam Doduc, Chair of the State Water Resources Control Board
Gary Wolff, member of the State Water Resources Control Board
and Song Her, Clerk of the Board

It is vital that we increase the regulatory oversight of chloramine discharge into our creeks, not decrease it! This chemical has had a significant impact on the presence and abundance of organisms in our waterways, and therefore the health of entire riparian systems and the San Francisco Bay Estuary. Any new policy on chloramines should be stronger, not weaker, on monitoring and regulation.

Currently Best Management Practices (BMPs) are the only means the Regional Water Boards have of keeping Water Agencies such as EBMUD from releasing chloramines into our creeks. The truth is that Best Management Practices are used erratically if at all in the event of a water main break and these BMPs are ineffective.

EBMUD pays lip service to even these requirements. I have personally witnessed two major discharges from broken water mains that flowed into Appian Creek, a tributary to San Pablo Creek in El Sobrante. In neither case did the repair crews use BMPs to control the discharge or treat the chloramines. When I phoned their office, the public communications person assured me that crews ALWAYS use BMPs to control chloramine. NOT TRUE! Appian creek flows past my house, and I have lived there over 20 years. We used to have Pacific chorus frogs breeding in the creek, but they aren't there any more. My neighbors have made the same observation.

We need to work towards a significant reduction in the discharge of chloramines into the storm drain system, our creeks, and all other waterways.

I urge to board to adopt regulations that strengthen monitoring and set a limit on discharge of chloramines backed up by penalties.

Thank you,

Martha Berthelsen
Volunteer and Steering Committee member with SPAWNERS (San Pablo Watershed Neighbors Education and Restoration Society)



Chlorine Policy
Deadline: 7/14/06 5pm