Apr. 29 2008 02:58PM P1

FROM:

Ad Hoc Committee for Clean Water

P.O.Box 484 Occidental, CA 95465 707 874-3855ph 707 874-2493 fax

4/29/08

Att: Karen Niiya Water Resources Control Board Sacramento, CA

1 of 2

re: Draft Policy for Maintaining Instream Flows in Northern California

In this era of almost complete collapse of the salmon fishery, it is imperative to create and implement a policy to maintain or restore instream flows. Streams are now mere trickles of their former robust and vigorous glory; and what little water is left is contaminated with personal care products, pharmaceuticals, drugs of every description, chemical toxins, hospital waste, surface runoff and all manner of point and non-point pollution.

We have used our waterways as open sewers long enough. We have been saved from typhoid and cholera outbreaks thanks to chlorination, however, that victory may soon be overturned by bacteria and protozoans that have learned to adapt to and survive chlorination, or by our own vulnerability to toxic impacts of chlorine.

1. Re-thinking The Flush Toilet and Off-site Sewage Treatment Plants:

Not discussed in your proposal are "offstream" composting toilets as part of a policy solution. The flush toilet is ultimately the root cause of much *diversion* of groundwater and introduction of pollutants.

How? Urban flush toilets are associated with miles and miles of sewer pipes to off-site treatment plants. These pipes are traditionally placed below ground. Pipes leak. We readily think of sewage leaking out of the pipes, but, they also let water in during the rainy season. The amount of water flowing to sewage treatment plants increases by a factor of seven to ten due to underground water infiltrating into leaky pipes in saturated soil!

This means, that as much as ten times the amount of water actually used for household purposes gets mixed with sewage and is treated at municipal plants as a result of our leaky underground sewer pipes! Groundwater leached out of the ground and into the sewer system makes an enormous wastewater treatment and disposal problem, aside from the fact that valuable groundwater is entering sewer pipes rather than California waterways for fish and human uses! Sewer pipes are competing with our streams and rivers for water flow!

Isn't it time to move on and create new policies outside the box? Are flush toilets and underground sewers a topic for immediate re-evaluation like the internal combustion engine?

2 of 2

Composting and incinerating toilets by contrast, reduce human waste to very little ash. The technology has advanced to make them affordable and available through Home Depot, Ace Hardware and Real Goods in Hopland! No sewer lines are needed and very little, if any, water. Bodily discharges are kept "offstream", so to speak. Dry toilets would dramatically decrease the bacterial and pharmaceutical load going to treatment plants. In rural areas, pollution of the groundwater via leachfields would be greatly reduced. Wells would no longer be pumped to provide water to flush toilets, a strange practice when you stop to reflect on it! Why not positive incentives devised by the Water Resources Control Board to install waterless toilets?

2. Water Conservation

Our land use practices involve massive water diversion engineering schemes to satisfy our need for water. Urban dwellers are notorious for not knowing where their water comes from or where it goes after they use it. As far as most people know, water comes "from a faucet" and goes "down the drain".

Rural folk and farmers are more aware of a critical need for water, but what positive incentives are there to decrease diversions, ponds, and limit the amount of water used for agriculture? What incentives can you come up with regarding choice of crops or size of herd?

An essential part of your policy proposal should be incentives for the public to grow drought tolerant landscaping, Mediterranean crops, plant rock gardens and *remove lawns*. There are myriad municipal programs that can be used as models for State policy, for example, the innovative "Cash for Grass" incentive for lawn-removal in Novato, recently duplicated in Santa Rosa and Valley of the Moon in Sonoma County. Also, the DMV instituted an incentive to purchase hybrid vehicles by allowing single driver hybrids access to the diamond lane with purchase of a "sticker" for pollution reducing vehicles! Can you come up with similar innovative incentive policies aimed at maintaining instream flows, rather than the usual punishment by fine for non-compliance?

Sincerely,

Ann Maurice