

Harold C. Appleton  
P.O. Box 1755  
Bodega Bay, CA 94923



Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I St., 24<sup>th</sup> Floor  
Sacramento, CA 95814  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)  
Mailed by May 23, 2014

Dear Ms. Townsend:

I am a supporter of Russian River Watershed Protection Committee, a river advocacy group that has been protecting the lower Russian River for 35 years. I wish to express my concern about the possible **Adoption of a General Order for Recycled Water Use** by the State Water Board.

Dept. of Health Services' Title 22 is the designated authority for wastewater irrigation, even though it does not address potential harm to aquatic life, recreationists and their pets from unregulated chemicals such as pesticides, pharmaceuticals, etc. getting into streams as a result of over irrigation. Regional Boards have been entrusted with adopting regulations to protect the environment, but it is unclear to what extent that will be followed in light of the Governor's emergency declaration to expedite irrigation in this water supply crisis. This concerns us.

Title 22 does not consider burgeoning scientific research in the last 20 years indicating that low dose exposures to endocrine disrupting chemicals has been associated with numerous and significant health impacts, both to humans and wildlife. Most pesticides and herbicides are endocrine disruptors. When unintentional overspray commonly occurs, it sends wastewater into creeks and streams, bringing with it not only the unregulated remnant chemicals in the tertiary wastewater, but also the chemical applications to landscapes running off with it.

By not integrating this scientific knowledge into Title 22, it fails to adequately protect the health of humans and aquatic life. Furthermore, as evidenced by irrigation practices in Sonoma County, use of tertiary wastewater is not monitored and reported in a way that protects against runoff into creeks and streams, resulting in impacts to fish and other aquatic life, and otherwise degrades our water supply. Stringent requirements must be enforced to assure that irrigation will occur in a totally safe manner, especially with the use of tertiary wastewater.

While I do not recommend the total cessation of tertiary wastewater irrigation on urban landscapes, I request that the following best management practices be required:

- Irrigation inspections should take place daily and only when system is operating.
- No irrigation should take place 100' from any creek or waterway.
- System should be temporarily turned off if any water is in gutter heading to drain.
- No spray irrigation should occur on narrow vegetation strips between impervious surfaces.
- All wastewater used for irrigation should be tested for endocrine disrupting chemicals .

Sincerely,

  
(Signature)

5/19/14  
(Date)