



LEAGUE OF WOMEN VOTERS OF CALIFORNIA

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March 10, 2008

The Honorable Tam M. Doduc, Board Chair
Jeanine Townsend, Clerk to the Board
Executive Office
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Re: Proposed Recycled Water Policy

Dear Chairwoman Doduc:

The League of Women Voters of California (LWVC) conditionally supports the SWRCB's proposed Recycled Water Policy and offers these comments on it.

The LWVC has long supported the use of reclaimed water for power plant cooling, groundwater recharge, agriculture, and landscape irrigation. The League also encourages a variety of water supply sources with emphasis on nonstructural alternatives. The recharge of groundwater basins with reclaimed water would add to the existing supply of water without the development of additional structures such as dams.

The proposed policy discusses the need to protect existing groundwater basins by assessing the quality of recycled water used for recharge purposes. However, it fails to include stringent and enforceable measures to control sources and treatment of salts and does not spell out the steps that should be taken in the event that a groundwater basin is contaminated with recycled water that is too high in salts. We believe that the policy should contain provisions both for the identification of responsibility for the contamination and for the range of remediation actions that might be needed to clean up the basin.

We also note that the proposed policy does not contain any discussion of actions (and funding for such actions) to take place if a Regional Water Quality Control Board does not adopt a regional recycling plan. The draft policy should deal with this.

Finally, we note that the proposed policy does not address the topic of emerging contaminants. We believe the policy should contain an element that allows the SWRCB to develop procedures for dealing with new and emerging contaminants as they become known.

Thank you for the opportunity to comment on the proposed Recycled Water Policy. We will be happy to respond to any questions you may have.

Sincerely,

/signed/

Janis R. Hirohama
President