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STATE WATER RESOURCES CONTROL BOARD  
JEANINE TOWNSEND: CLERK OF THE BOARD  
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Dear Chairman Hoppin and Board Members:

I wish to express my concerns about the “*Revised Recycled Water Policy Amendment*” released for comment on September 17, 2012. **I object to the failure of this policy to require monitoring for endocrine disrupting chemicals in tertiary wastewater used for landscape irrigation:**

- This amended policy totally ignores substantive comments and documents submitted by Russian River Watershed Protection Committee (RRWPC) indicating significant public concern for the many health impacts to humans and wildlife caused by very low dose exposures to endocrine disrupting chemicals. RRWPC has noted repeated over-irrigation in Rohnert Park and the City of Santa Rosa and we believe that controls are inadequate.
- This amended policy totally ignores the substantive comments of Dr. Laura Vandenberg of Tufts University and lead author (with 11 other scientists) for the study: *Hormones and endocrine disrupting chemicals: Low dose effects and non-monotonic dose responses*, Endocrine Reviews. Online Mar. 14, 2012) **THIS 75 PAGE STUDY EXAMINED 850 RELATED SCIENTIFIC STUDIES. SCIENTISTS CONCLUDED THAT THERE ARE NO SAFE DOSES FOR ENDOCRINE DISRUPTING CHEMICALS. Monitoring is critical.**
- This amended policy fails to consider the comments of the director of the National Institute of Health and Department of Health and Human Services, Linda S. Birnbaum, who states in *Environmental Health Perspectives* Online March 14, 2012: *Low internal doses of endocrine disruptors found in typical human populations have been linked to obesity, infertility, neurobehavioral disorders, and immune dysfunction, among others.*
- The use of spray irrigation not only sends these chemicals through the air, but when runoff occurs, which often happens, it carries with it the herbicides, pesticides, etc. applied to the landscape prior to the wastewater irrigation. There are other problems too numerous to mention here, but these are some of the most significant ones.

I recommend that at a minimum, estrogen (17B-estradiol) be regularly monitored in the wastewater used for irrigation. I also support 100’ setbacks from waterways to assure runoff of these chemicals does not occur. I would prefer to see drip irrigation utilized rather than spray. Also, incidental runoff should be regulated through the NPDES permit particularly since summer flows cannot adequately assimilate the toxins at a time when recreational use is high.

Sincerely,

Carol Sklenicka

