

Environmental Justice Coalition for Water

654 13th St
Preservation Park
Oakland CA 94612



) 510-286-8400
(f) 510-251-2203
www.ejcw.org

September 4, 2007



Ryan Maughan, division of Water Quality
State Water Resources Control Board
1001 I Street 15th Floor, Sacramento, CA
Fax 916-341-5584
rmaughan@waterboards.ca.gov

Re: "Comment Letter – September 13, 2007 Irrigated Lands Program Joint Workshop."

Dear State and Regional Water Board Members,

The Environmental Justice Coalition for Water (EJCW) appreciates the opportunity to comment on the Irrigated Lands Program.

The Environmental Justice Coalition for Water represents over 60 community-based and non-profit organizations throughout California, all working on water issues specific to low-income communities and people of color, both rural and urban. As a member of AGUA, an association of residents of Central Valley communities and community based non-profit organizations, the EJCW urges the State Water Resources Control Board to address the lack of groundwater protections within the current Irrigated Lands Program. The lack of strong protections within this program has led to the severe contamination of drinking water supplies for thousands of people in the Central Valley.

The EJCW feels strongly that effectively addressing the chronic groundwater contamination throughout the Central Valley would the State Board must require owners and operators of irrigated lands that discharge into groundwater to submit Reports of Waste Discharge and issue individual or general WDRs to these dischargers.

The EJCW commends the State Board for taking the initiative to evaluate the progress of the Irrigated Lands Program. Given the extent of groundwater and surface water contamination, and the Irrigated Lands Discharge program's failure to substantively address this contamination, the EJCW is concerned that stronger steps need to be taken to address groundwater pollution from agricultural discharges. According to recent

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 U.C. studies nearly all Central Valley agricultural runoff violated



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water quality standards. Additionally, State testing in Tulare County has found that 75% of all private wells tested above legal limits and nitrate levels exceeded the maximum contaminant levels in 40% of the wells. This is of grave concern when most Central Valley communities rely on groundwater as a primary source of drinking water. According to the Department of Public Health, more than 40,000 people in Central Valley communities each year are exposed to unsafe and illegal levels of contaminants in their drinking water due to groundwater contamination.

Not only does protecting California's groundwater fall squarely within the mandate of the State and Regional Boards, but it is an urgent issue of environmental justice. By enabling waste discharges to continue, the Central Valley Regional Water Quality Control Board places an undue burden on low-income communities of color. These communities are already paying up to 10% of their income for contaminated water and must pay very costly replacement water. While irrigators enjoy subsidized water, small communities must either contend with contaminated water or pay for prohibitively expensive treatment or new wells. The State Board and Regional Boards can no longer ignore the cumulative impacts that small, rural communities throughout the Central Valley face as a result of intensive agriculture.

Specifically, EJCW requests that the State Board require staff to develop a WDR program for irrigated lands the discharge into groundwater. Within this program, the State Board must require best management practices for all groundwater and surface water discharges. The State Board should also require a comprehensive groundwater management program.

Communities throughout California are waiting for the Central Valley Regional Water Quality Control Board and the State Board to protect their sources of water. Agricultural waivers are not a solution and will continue to perpetuate and exacerbate current surface and groundwater contamination. We look forward to working with you to create a solution to the Valley's dire drinking water issues,

Sincerely,

Miriam Torres