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Angela Schroeter/Howard Kolb
Central Coast Regional Water Quality Control Board
Email: aschroeter@waterboards.ca.gov, hkolb@waterboards.ca.gov

Subject: COMMENTS on the Central Coast Regional Board's November Draft Order for Irrigated Agricultural Discharges

Dear Regional Water Quality Control Board Members:

Thank you for the opportunity to continue to provide public comments on the Central Coast's November 2010 Draft Order for a Conditional Waiver for Irrigated Agricultural Discharges. On behalf of California Rural Legal Assistance, Inc., we are concerned that the latest version of the Draft Order for Irrigated Agricultural Discharges fails to adequately protect the public and the environment from serious pollutants. Specifically, it fails to protect against pesticide, sediment, and nitrate pollution of ground and surface water.

California Rural Legal Assistance, Inc. represents migrant farmworkers throughout the region regulated by the Central Coast Regional Water Quality Control Board. Specifically we represent impacted populations in Monterey County, San Luis Obispo County, San Mateo County, San Benito County and Santa Cruz County. The communities we serve, and the communities most impacted by contaminated groundwater, are low income communities of color. Farmworkers are especially at risk of being exposed to polluted well water in migrant worker labor camps, or as a result of living in communities adjacent to farmland.

In Monterey County, 25 percent of the 352 wells sampled (88 wells) had concentrations above the nitrate drinking water standard in the northern Salinas Valley. In portions of the Salinas Valley, up to approximately 50 percent of surveyed wells had concentrations above the nitrate drinking water standard, with average concentrations nearly double the drinking water standard and the highest concentration of nitrate approximately nine times the drinking water standard. As acknowledged in the Executive Summary, "the water quality impairments are well-documented, severe, and widespread." (Pg. 7, Staff Report). Children and pregnant women are particularly at risk when exposed to toxic levels of nitrates and pesticides.

While we applaud the willingness to make revisions to the grossly inadequate 2004 Agricultural Waiver, the current revisions do not go far enough to mitigate the environmental, health, and cost impacts of agricultural runoff.

Lack of surface and groundwater protections have gone on too long at the expense of community and watershed health. Hence, we applaud your efforts to address water contamination by agriculture. We strongly urge you to take timely action to put in place stringent requirements for irrigated agriculture discharges so that California's water is truly protected and restored.

Thank you,

Phoebe Seaton, Program Director
California Rural Legal Assistance, Inc.



