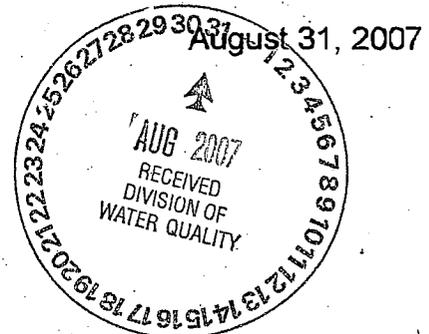




SAVE THE AMERICAN RIVER ASSOCIATION, INC.

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Ryan Maughan, Division of Water Quality
State Water Resources Control Board
1001 I Street, 15th Floor
Sacramento, CA 95814

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

Dear State Board and Regional Water Quality Control Board Members:

Thank you for the opportunity to provide public comments on the Central Valley's Conditional Waiver program for Irrigated Agriculture. On behalf of the Save the American River Association (SARA), I call on you to act now to protect and restore the quality of the region's water supply from this major source of pollution.

Depending on the location there is usually a connection between ground water and surface waters. Irrigation water and wastewater run-off from fields contain a toxic mix of fertilizers and pesticides, which ultimately flow into our waterways and seep into the shallow and deep aquifers. In the San Joaquin Valley the agricultural drainage and wastewater is a mix of agricultural chemicals with the added kicker – Selenium.

The USGS in "Water Quality in the San Joaquin-Tulare Basins, California, 1992-95, (Dbrovsky, et al, 1998), reports that in addition to tons of salt there are at least 49 agricultural pesticides and other chemicals (nitrate fertilizers) in surface water and 25 were detected in ground water. DBCP concentrations exceeded drinking water standards in 20 percent of the drinking wells tested. Pesticides were found in 69 percent of the ground water samples collected.

Chemicals banned in 1970 such as DDT (including DDD and DDE), toxaphene, dieldrin and chlordane, are still found in mud, in clams and fish tissue samples from the San Joaquin River and Delta which exceed guidelines for protection of aquatic life and fish eating wildlife. There was strong correlation between concentrations of total DDT in clam and fish tissues and bed sediments suggesting that bioaccumulation was still taking place. There were seven pesticides that exceeded criteria for the protection of freshwater aquatic life. These included the herbicides diuron and trifluridin and the insecticides azinphos-methyl, carbaryl, diazinon, chlorpyrifos, and malathion.

The exceedance of water-quality criteria indicates a strong probability that aquatic species are being adversely affected across the ecosystem. In a laboratory, test organisms are usually exposed to one pesticide at a time, while 49 chemicals were identified in this chemical brew called the San Joaquin River. We also do not know the synergistic effects of the chemicals with each other or when Selenium has been added to the mix.

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Many agricultural chemicals can affect development processes, can induce toxicity, can impair immune system response or that are endocrine disruptors are of particular concern as they pass up the fish and wildlife food chain because so little is known about them long term. The impacts to people are presently unknown, but impacts to wildlife give us some warning signs.

Contaminated aquifers affect us all. As a result, many local drinking water sources are the worst polluted in the State. Many people in Central Valley communities are exposed to unsafe and illegal levels of contaminants in their drinking water due to groundwater contamination. Today over 20 percent of all community systems in Tulare County cannot meet basic safe drinking water laws, almost entirely due to nitrate contamination of groundwater sources.

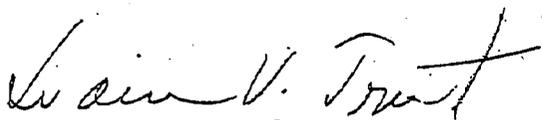
While State Board's orders and regulations supporting the protection of water quality are in favor of the people, the appointed officials who are supposed to enforce such orders and regulations do not appear to be in favor of such orders and regulations.

Currently the Central Valley Regional Water Quality Board allows water with highly concentrated levels of fertilizers and pesticides to contaminate community drinking water sources without ANY regulatory requirements. Apparently irrigators are given a green light to pollute, while small and rural communities have to pay for bottled water and the cost of drilling new wells or treatment technology. Because some sources of irrigation runoff are contaminated and are unregulated, some residents in the Central Valley have to pay some of the highest proportional water rates in the state for what amounts to is poor quality undrinkable water.

The lack of protection for our groundwater supplies statewide has gone on too long at the expense of individual and community health and welfare. The Save the American River Association strongly urges you to act today to stop waiving regulatory requirements and issue permits to regulate irrigated agriculture that are truly protective of our drinking water sources and other beneficial uses.

The State Board and the Regional Boards are not to allow the pollution of our rivers, streams and groundwater leaving a degraded legacy for our grandchildren. These same agencies should not look like shills for corporate farms, huge water districts or developers. Nor should appointed public officials.

Sincerely,



Warren V. Truitt, President
Save the American River Assn., Inc. (SARA)

cc: SARA Board of Directors