



California Regional Water Quality Control Board Central Coast Region



Linda S. Adams.
*Secretary for
Environmental Protection*

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Edmund G. Brown Jr.
Governor

Public Comments to

Draft Agricultural Order, released 11/19/2010

57: Form Letter - this letter was received from the following 29 individuals:

Name	Date Received
Louise H. Stuart	01/03/2011
Andrea Brown	11/03/2011
Robert Frischmuth	01/03/2011
Helena Davis	01/03/2011
Nelle Jane Ryder	01/03/2011
H. Zarzow	12/30/2010
Robin Lee	12/30/2010
Joan Bennett	12/31/2010
Elise P.	12/31/2010
June Michel	12/31/2010
Louis Wagner	01/03/2011
Andy Pease	01/03/2011
Quin H.	01/03/2011
Joan Scott	01/03/2011
Janet Clarke	01/03/2011
Regina Whitah	01/03/2011
Ann Williams	01/03/2011
Norman Scott	01/03/2011
Richard D.	01/03/2011
Darlene S.	01/03/2011
Catherine Krupp	01/03/2011
A. Brown	01/03/2011
Eric Olsen	01/03/2011
A. Lutik	01/03/2011
Alaine Simer	01/03/2011
Richard Allen	01/03/2011
Joy A. Fault	01/03/2011
Barbara Watson	01/03/2011
Sonya Sukalski	01/03/2011

To:

Angela Schroeter/ Howard Kolb

Central Coast Regional Water Quality Control Board

Via E-mail: AgOrder@waterboards.ca.gov, or Fax: 805 543 0397

Subject: Ag Order Comment: SUPPORT WITH ESSENTIAL AMENDMENTS for the Central Coast Regional Board's 2011 Draft Conditional Waiver for Irrigated Agricultural Discharges

Dear Members of the Central Coast Regional Water Quality Control Board (Regional Water Board),

We applaud the Regional Water Board's efforts to regulate contaminated agricultural discharges. We are residents of the Central Coast region and we care about this issue as it affects our drinking water and health. Most communities and families in the Central Coast drink groundwater, but it is contaminated with nitrates and other pollutants, because of agricultural runoff. Nitrates in water can cause severe health impacts, including the fatal "blue baby syndrome". While many cities on the Central Coast are paying a high price to treat their water to remove nitrates, there are many communities who are forced to drink toxic water or are forced to pay a high price for buying replacement water.

We hope you will treat it as a priority to clean our drinking water. At the public meetings in San Luis Obispo in May and Watsonville in July, you acknowledged that nitrate groundwater contamination was a big problem and that human health and drinking water were crucial issues in considering the Staff Recommendations for the Agricultural Order. Yet we see that the new recommendations have removed many crucial protections for groundwater. We support many aspects of the 2011 Draft Order, but only with certain necessary amendments. We hope you will work to remedy this situation and pass an Order that fully protects human health and drinking water. Specifically, we strongly urge you the following amendments:

1. We support the Tiering system, but the Tiers have been set up in a manner that renders them useless. It is disappointing that there are no Tiers based on high nitrate contamination. In addition, we understand that over 98% of farms are under 1000 acres in the Central Coast, and will most likely be placed in the lowest category Tier 1, with almost no regulation, even if they pose a high threat to increased nitrate contamination. This would be a real travesty of justice and would not help to clean up our drinking water.
2. We are also disappointed that the regulation of tile drain areas has been delayed. Tile drain areas have shallow groundwater and are these areas are very polluted. We urge the Regional Board not to avoid action on one of its most critical problems but to include this provision in the recommendations immediately.
3. We are also disappointed that the Staff has specified 2 particular pesticides, Diazinon and Chloropyrifos, in the Tiering criteria, but have excluded many other toxic pesticides, and have also overlooked the fact that synergies between chemicals produce the most potent and dangerous impacts on human health. We urge you to not specify just these pesticides in the

Tiering criteria, but rather focus on all pesticides that will increase toxicity and damage water quality.

- 4. We also feel disappointed that the timeline is too liberal. Toxic discharges are illegal, and hence toxic runoff should be dealt with and stopped immediately.

However, there are aspects of this 2011 Draft Order that we support.

- a) We support the staff of the Regional Board in their brave attempt to address a serious problem and decide to stand up for drinking water issues and especially in support of poor communities.
- b) We are encouraged that the Regional Board is moving ahead to protect ground water, surface water and aquatic habitat.
- c) We are encouraged that the Regional Board will require monitoring and reporting by growers in high-risk situations.
- d) We are encouraged that the Regional Board will regulate landowners as well as operators.
- e) We support the provision that the Executive Officer may require Dischargers to locate (inventory) and conduct sampling of private domestic wells in or near agricultural areas with high nitrate in groundwater and submit technical reports evaluating the sampling results, and may require Dischargers to provide alternative water supplies or replacement water service, including wellhead treatment, to affected public water suppliers or private domestic well owners.

The 2011 Draft Order is a vast improvement on the 2004 Conditional Waiver, but is much weaker than the February Draft. We urge you to revert to the February Draft as that is more responsive to drinking water, public health and environmental justice concerns. We want you to regulate agriculture so that it does not contaminate the drinking water on the Central Coast. All polluters must be accountable.

Sincerely,

*Unitarian Universalist Fellowship of
San Luis Obispo Co. (805) 544-1669*

Elin Pritchard
Jane Minikel
Louis Weyer
Judy Pease
Quin Hauss

San Luis Obispo, CA

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*Pursell Akin Legislative Ministry Rep - UUFSCU @
 Unitarian Universalist San Luis Obispo Co. 0280
 (805) 534-*

*Wanda J. Scott
 Joan M. Acott
 Janet Clarke
 Regina Whitah
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 Andrew Stone
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 Richard L. Allen
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 Barbara Watson*