

Mr. Adam Laputz,

Runoff from irrigated agriculture is identified as the largest source of pollution to Central Valley waterways and the Delta. Monitoring downstream of agricultural areas reveals that virtually all sites exceed water quality standards and almost two thirds are toxic to aquatic life. Pollution is identified as one of the principle causes of the collapse of Central Valley fisheries. Agricultural pollution also threatens drinking water supplies and public health and is a major source of groundwater impairment. Inexplicably, irrigated agriculture remains exempt from routine requirements to protect water quality that have long been applicable to virtually every other segment of society.

The Regional Board needs to propose a Framework, which will be followed-up over the next year with specific orders. I urge you not to continue the same basic approach to regulating agriculture that has proved to be a dismal failure: i.e., ceding implementation of the program to industry advocacy groups. Under this scheme, the Board doesn't know who is discharging, what pollutants are being discharged, the localized impacts to receiving waters and whether dischargers are implementing measures to reduce or eliminate pollution or if those measures are working. Consequently, the Board cannot identify any improvement in water quality or any effort to stop pollution.

Sincerely,

Charles Adams

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