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January 12, 2010

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
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E-mail <commentletters@waterboards.ca.gov>

Subject: January 18-19, 2011 Board Meeting- Agenda Item 12, Informational Report on the Reasonable Use Doctrine and Recommendations on the Application of the Doctrine to Promote More Efficient Use of Agricultural Water

Dear Ms. Townsend:

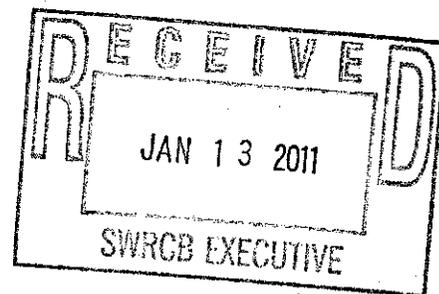
Thank you for the opportunity to provide input concerning the above-referenced agenda item. C-WIN supports the staff recommendation that the State Water Board conduct at a future date, a Reasonable Water Use Summit.

We believe, however, that the Delta Watermaster's report should be amended to include consideration of unreasonable use of water as a result of irrigation of saline, seleniferous soils which pollute groundwater and surface waters. Specifically, New Melones water releases are made at the expense of other beneficial uses for dilution of the salt pollution from western San Joaquin Valley sources such as the Grasslands Bypass Project. Downstream, farmers in the Delta are harmed by the salt pollution from those same upstream agricultural sources.

The Bay-Delta food chain continues to be contaminated with selenium as evidenced by selenium water quality impairment from agricultural sources for 41,736 acres in the Delta, 5,657 acres in the Carquinez Straights, 70,992 acres in San Francisco Bay Central, 9,024 acres in San Francisco Bay south and 68,349 acres in San Pablo Bay. The San Joaquin River is a major source of that impairment.¹

The Reasonable Use Water Summit should consider if the benefit to a few from irrigation of toxic lands in the western San Joaquin Valley is worth the overall cost to society and the environment.

¹http://www.waterboards.ca.gov/water_issues/programs/tmdl/docs/303dlists2006/epa/state_us_epa_combined.pdf



Respectfully submitted,

A handwritten signature in black ink that reads "Carolee Krieger". The signature is written in a cursive, flowing style.

Carolee Krieger, President and Executive Director
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