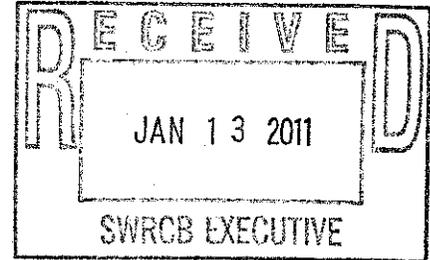


January 13, 2011

Charles Hoppin, Chair
State Water Quality Control Board
1001 I Street
Sacramento, CA 95814



Re: January 18-19 Board Hearing
Item 12: Report on the Reasonable Use Doctrine and recommendations on the application of the doctrine to promote more efficient use of agricultural water.

Dear Chair Hoppin and Board Members;

On behalf of the Environmental Justice Coalition for Water and our member organizations, I am writing to support the recommendations of the Delta Watermaster in his report on applying the Reasonable Use Doctrine to agriculture.

We concur with the Delta Watermaster in his conclusion that "Inefficient Water Use is unreasonable water use." For the communities in which we and our members work the consequences of this "unreasonable use" go beyond the consumption of the water to include water quality impacts. Research and analysis conducted for the Irrigated Lands Regulatory Program has shown that irrigation efficiency – or lack thereof – plays a key role in the transport of contaminants into groundwater supplies. An effective source water protection program couples a reduction in the application of fertilizer and pesticides with more targeted irrigation methods. Enforcement of the Reasonable Use Doctrine can help reverse the trend of continuing groundwater quality degradation, particularly in the Central Valley and Central Coast.

While we would prefer more aggressive action be taken, we support the call for a reasonable use summit on agricultural water use efficiency. We look forward to participating and ensuring that the outcomes support the Public and Tribal Trusts and provide for a sustainable future for California water.

Sincerely,

Handwritten signature of Debbie Davis.

Debbie Davis
EJCW

Handwritten signature of Martha Guzman-Aceves.

Martha Guzman-Aceves
CRLAF