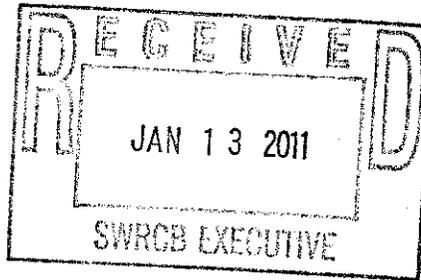




January 13, 2011

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



San Francisco
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San Francisco, CA 94105
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www.cleanwateraction.org/ca

**Re: January 18-19 board hearing
Item 12: Waste and Unreasonable Use Doctrine**

Dear Chair Hoppin and Board members;

On behalf of Clean Water Action and its 85,000 California members, I am writing to support the efforts of the Delta Watermaster to apply the Reasonable Use Doctrine to agriculture. Our organization is particularly interested in the potential water quality benefits of such an application.

The 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.

Because over-irrigation is now a major source of aquifer recharge, it is also imperative that application of the Reasonable Use Doctrine be combined with appropriate groundwater management practices. It would be unfortunate if improved agricultural water efficiency provided more water for the Delta at the cost of further depletion of Central Valley aquifers.

We look forward to participating in future discussions of this issue

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Clary".

Jennifer Clary
Policy Analyst