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To: The United States Environmental Protection Agency, USEPA

MISSION STATEMENT: Living Rivers Council was established to protect, restore, defend and preserve watersheds in natural harmony with the people and wildlife that depend on healthy water for economic vitality recreation enjoyment and ecological sustainability. We endeavor to pursue these goals through education, research, consensus building and advocacy.

Living Rivers Council, LRC, became alarmed after lab samples in 2016 of the groundwater in the Napa River basin tested positive for glyphosate, a known carcinogen .

With over 55,000 acres of vineyards throughout Napa County the use of pesticides, herbicides and fungicides is prevalent.

Napa County has the highest cancer rates in the State for several years. Last year children had the highest cancer rates. This year it is white women.

LRC's expert, Fisheries Biologist Patrick Higgins, has submitted herein our comments on the ecological harm of glyphosate and the insidious and lethal binders used in the formulation.

Chris Malan

Executive Director

Living Rivers Council