



Keith Brandt- President
Robert Gayaldo – 1st VP
Daniel Suenram – 2nd VP
Brenna Sullivan – Executive Director



December 20, 2017

Felicia Marcus, Chair
State Water Resources Control Board
1001 "I" Street
Sacramento, California 95812-0100

RE: "Comments to A -2239(a) -(c)." Second Staff Proposed Order Revising the Eastern San Joaquin General Order R5-2012-0116

Dear Chair Marcus:

The Lake County Farm Bureau Education Corporation administers the Irrigated Lands Program as a member of the Sacramento Valley Water Quality Coalition. We are writing on behalf of our nearly 200 enrolled members farming 14,000 acres to express concern about proposed regulatory changes in the East San Joaquin WDR revision. The precedential direction by the State Water Resources Control Board fails to recognize regional differences in agricultural practices, surface water quality and groundwater conditions. The "one size fits all" approach in the Second Staff Proposed Order does not make sense for water quality conditions in Lake County and will result in disproportionate burden to agricultural operations in our area.

In the Lake County Sub-watershed, the surface water quality results since 2005 have shown just two exceedances for pesticides—one being a legacy pesticide and the other used very little in agriculture that year. There have been zero toxicity exceedances and just one Nitrate + Nitrite exceedance in stagnant conditions. These results suggest that Lake County farmers have been successful in implementing the Irrigated Lands Program and protecting water quality. Because of our low vulnerability status, low water quality exceedance history, low agricultural land-use and widespread implementation of BMPs, Lake County is on a Reduced Monitoring Program. The Second Proposed Order is recommending the establishment of a Surface Water Expert Panel to restructure the size and scope of water quality monitoring. This approach does not make sense for Lake County. The current program has been effective at protecting surface and ground water quality in our sub-watershed.

The State Board's FAQ states the Proposed Order is intended "to minimize increases in the reporting burden for growers and the coalition." However it does the exact opposite by requiring land owners in low vulnerability areas to have the same reporting requirement as high vulnerability areas, complete and certify a new and expansive Irrigation and Nitrogen

Management Plan (INMP), and complete a newly created form - the Management Practices Implementation Report (MPIR). These requirements designed for more impacted areas of the state will have a disproportionate effect on our smaller operations. The Proposed Order acknowledges on Page 25, "The expanded reporting obligations will result in increased costs to the growers in low vulnerability areas." Many small farmers in Lake County already feel burdened by the current costs of the Irrigated Lands program. Increases in cost and reporting will further undermine the Coalition approach in our area. Our office will face a similar hardship and associated costs will have to be passed onto our members.

The State Water Board's reliance on the recommendations of the Agricultural Expert Panel formed by the California Department of Food and Agriculture is understandable given the knowledge of groundwater quality at the time. However, the results of the 2016 *High Resolution Mapping the Central Valley* for the CV-SALTS Plan and Dr. Thomas Harter's long term study to the loading of groundwater in the Central Valley show the Sacramento Valley, with limited exception, has excellent groundwater quality and will for decades to come. Localized impacts from nitrate on groundwater quality and naturally occurring sources of groundwater salinity may require additional management actions, but the long-term ambient groundwater quality is projected to remain well above any levels of impairment. Given the groundwater quality conditions in the Sacramento Valley and the limited areas of impairment, requiring the owners and operators of irrigated lands in our area to sample on-farm drinking water wells is a burden without benefit. This should be handled locally where conditions dictate.

The Second Proposed Order fails to account for the excellent groundwater and surface water quality in areas such as Lake County, which will not benefit from increased regulations and will be negatively impacted by their implementation. We urge you to review the precedential nature of the East San Joaquin order to account for nuance in our vast, diverse state.

Sincerely,



Brenna Sullivan
Executive Director, Lake County Farm Bureau Education Corporation