Rancho Ellenita
P.O. Box 207
Coachella, CA 92236
(760) 398-8326

May 23, 2016

State Water Resources Board
1001 I Street, 24th Floor (95814)
P.O. Box 100
Sacramento, CA 95812-0100

RE: Comment to A-2239(a)-(c)

Dear Chair Marcus and Honorable Members of the Board:

I am a small grower in the Coachella Valley, raising dates, sweet limes and figs, as well as a Director on the Board of the Coachella Valley Irrigated Lands Coalition. This 40 acre farm has been in our family for 66 years, and I am concerned that the Proposed Order will lead to the end of our farming.

I am not only a farmer but also an environmentalist, hopefully one who strikes a balance between protecting our planet and feeding our populous. Indeed, I am very active in land conservation and protection of our natural resources (I'm in my 10th year on the Governing Board of the Coachella Valley Mountains Conservancy). It is due to increasing demands of the urban interface that I have transitioned from vegetables (row crops) to tree crops.

My family drinks well water, so we are personally concerned about the quality of California's water. But, I am concerned also that this casts an implication that the agricultural community is not protecting our water. Agriculture is a vital component of the economy of our State, especially in our less urbanized areas; it not only employs many who have no other skills, but also feeds many of us on small farms. With the intense competition from foreign countries who do not adhere to our standards, adding to the financial burden of small farmers and ranchers will surely drive many of the small farmers out of business; the prices of our produce are market driven and we cannot simply pass the added cost onto the consumer. There are few other countries in the world produce agriculture to our safety level.

Some of my concerns:

Trying to craft a regulation that is applicable to the entire State does not take into consideration the

great differences in geology and hydrology throughout the State, as well as the differences in farming methods and crops. In the Coachella Valley, we farm using water from the Coachella Branch of the All American Canal; by federal mandate, we must contain all of our water on our properties, i.e. there is no "tail water." We're in a desert; only in an extreme climate event do we ever have any run-off, and with Climate Change, it is predicted it will only become hotter and drier here.

Due to the geology of the Valley, we actually have two underground water "systems": a perched watertable composed of water that has percolated through the sand, then a clay layer (ancient seabed), and below that an aquifer (source of well water).

Water applied to our farms percolates through the soil (mostly sandy loam). Following World War II and the beginning of canal water delivery, this watertable began to dramatically rise, leading to the installation of underground tile drainage to carry surface water (agriculture, landscaping, domestic, etc.) through multiple pipes to the Coachella Valley Storm Channel (Whitewater River) and eventually the Salton Sea. This percolation through the sand naturally filters the water that reaches the channel. Our Coalition is monitoring that drainage, including its nitrogen content. Since we have not been identified as an "vulnerable" area, the requirement for nitrogen application accounting (reporting of nitrogen applied divided by nitrogen removed (A/R), as well as nitrogen applied minus nitrogen removed (A-R)) and the development of nitrogen removed coefficients, would place an egregious economic burden on our small farmers who are barely surviving financially. Our farm is run by myself (a 68 year old woman) and one full time farm hand (we hire help when we absolutely must); the cost of implementing this reporting would put me out of business.

Additionally, reporting crop yields would be an administrative nightmare: while we can calculate the crops sold, some of the fruit never ripens or rots on the tree; much of that is raked up and sent to the landfill without weighing how much of the material is what (we used to send it to the biowaste composing site, but that was closed down due to complaints from a subdivision built long after it was put into operation). Also, if I am unable to find a buyer for all of the crop, I donate the remainder to charities such as Second Harvest. I have never asked them to account for how much they picked.

Farmers are in business to make money, not to support fertilizer and chemical companies by using their products in excess. I believe a great deal more chemical abuse comes from domestic application of fertilizers and pesticides to landscaping, with <u>no monitoring</u>. The average homeowner and gardener is not educated regarding the amount and application of chemicals.

In our valley, our wells are dug deep enough to access the aquifer below the ancient seabed. Most of that water is ancient; (pre-drought) somewhere in the neighborhood of 3% was replenished by run-off from the surrounding mountains annually. Now it is mostly replenished by canal water introduced via spreading ponds at elevations on the side of the valley that allow water to flow through the sand to the basin below the clay seabed.

Due to our geology, well water from the aquifer below the ancient seabed is not run-off from our farms and thus would not produce any useful data for application of chemicals and irrigation on the surface.

I respectfully request that you reconsider the financial impact the Proposed Order would have on small farmers and ranchers through out the State. And, that you recognize that each basin is unique and would be better monitored and maintained by the "local" Regional Water Quality crafting Orders addressing the local hydrology and farming practices, and by local Coalitions implementing the Orders.

Sincerely yours,
Ellen Lloyd Trover