



May 27, 2016

Ms. Jeanie Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
P.O. Box 100  
Sacramento, CA 95812-0100

RE: Comments to A-2239 (a) – (c)

Dear Chair Marcus and Members of the Board:

The Del Norte County Farm Bureau is writing to you to express our concerns with the Proposed Order to the East San Joaquin Coalitions' Irrigated Lands Regulatory Program.

The primary commodities in Del Norte County are field grown Easter lilies (row crops), beef and dairy. The primary growing region is Smith River.

We are opposing the new Nitrate Program, individual field reporting data and excess monitoring of wells.

We do not have a coalition to determine our A/R factor to develop the nitrogen removed coefficients. We can be certain there will be costs and limited resources to begin this process. Our Dairy ranches (7) obtained their Conditional Waiver in 2013. Baseline results on eight drinking water wells found the highest level to be 7.2. Through continued successful ground water monitoring the dairies nitrate groundwater component was eliminated.

The Smith River Community Services District's current water quality testing report states nitrate levels at 2.7.

The North Coast Regional Water Quality Board has been working directly with the Easter Lily Group (4) in developing their waiver since 2012. The Lily Group provided an onsite tour, power point presentation and water sampling access (SWAMP) for ground and surface water. The drinking water wells tested for Nitrates were below 7.0. Rebecca Fitzgerald, staff at the North Coast Regional

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DEL NORTE  
COUNTY  
FARM BUREAU

Water Quality Control Board, presented to our Del Norte Board of Supervisors the 2013 SWAMP surface water baseline report results which concluded the Lily Group's water results were of no health concern to the public. The 2015 groundwater SWAMP interim Monitoring report results indicate Nitrate levels for drinking water wells are below 7.0. – Thus, Del Norte does not have a nitrate issue.

The field specific farm evaluation and management practice data creates privacy concerns. It jeopardizes our personal information and opens us up to unwarranted litigation that small farms like ours cannot defend. Many families live on their own farms. This is a security issue for families as well as a risk to our management practices that are trade secrets.

Del Norte's annual irrigated lands Land Use Report by the Department of Water Resources is 8,383 acres with 12 family farms. The Central Valley has millions of acres and 34,000 farms. The comparison is off the chart. We do not have CWA 303d listed rivers or tributaries in Del Norte County. We do not have a drought. A statewide approach does not work for us. One size does not fit all.

When Secretary Karen Ross spoke at the May 4<sup>th</sup> public hearing she asked the Board to consider a practical approach. We are asking for a practical approach. She said we need to farm well, produce good crops, educate and protect water. We have and will continue to strive for this approach.

We would like you to remove this order as a statewide mandate and let the coalitions and groups continue with the existing program in less nitrate affected areas.

Don't tie the hands of the stewards of the land with more costly regulations that are not practical and are not proven to work any better than the existing programs. Again, remember one size does not fit all.

Thank you,

Rob Miller, President