

County of Placer Board of Supervisors

175 FULWEILER AVENUE
AUBURN, CALIFORNIA 95603
530/889-4010 • FAX: 530/889-4009
PLACER CO. TOLL FREE # 800-488-4308

JACK DURAN
District 1

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District 5

Public Workshop
Eastern San Joaquin General Order
Deadline: 6/1/16 by 12:00 noon



May 17, 2016

Ms. Jeanine Townsend
Clerk of the Board
State Water Quality Control Board
P.O. Box 100
Sacramento, CA 95812

Sent via e-mail to: commentletters@waterboard.ca.gov



Re: Opposition to proposed Order for Eastern San Joaquin River Watershed

Dear Ms. Townsend:

On behalf of the Placer County Board of Supervisors, we oppose the proposed order for East San Joaquin. The "one size fits all" approach does not work in a State that is as diverse as California and will be harmful to foothills farmers whose practices are far different than that of those in San Joaquin and the central valley.

The current order governing the Sacramento Valley, which tiers and prioritizes utilizing risk-based analysis, is the correct approach to ensuring water quality, because it accounts for differences in cropping patterns, soil types, and geography. There is absolutely no need to increase reporting requirements, the number of monitoring sites, private well testing, or any other requirement that increases the regulatory burden without providing any real improvement in water quality.

Additionally, the Placer-Nevada-south Sutter-north Sacramento (PNSSNS) Subwatershed group has been in existence since 2003 as a result of the removal of the exemption for irrigated agriculture and is part of the larger Sacramento Valley Water Quality Coalition. Irrigated agriculture within this largely foothill watershed consists of only 2.6% of the land use. The PNSSNS membership consists of 510 members with over 50% having ten acres or less.

PNSSNS has applied for a Reduced Monitoring/ Management Practices Verification Plan as allowed through the current Order R5-2014-030. This Plan recognizes low threat/ low vulnerability sub-watersheds that have demonstrated good water quality results, low intensity agriculture and minimal pesticide use and no reported toxicities. We would ask that you encourage the Central Valley Regional Water Quality Control Board to approve this application, and allow Placer County's farmers and ranchers to be granted regulatory relief because of all of the work they are currently doing to protect water quality.

To date, the farmers and ranchers that belong to the PNSSNS Subwatershed coalition have paid over one million dollars in order to comply with the Irrigated Lands Regulatory Program.

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Page 2 of 2

We ask the State Water Quality Control Board to recognize the commitment our farmers and ranchers have made to protecting water quality, and further ask you to find solutions that do not increase the costs, paperwork and overall regulatory burden to our small family farms and ranches.

Sincerely,

COUNTY OF PLACER



Robert M. Weygandt, Chair (District 2)
Placer County Board of Supervisors

CC: Placer County Board of Supervisors
David Boesch, County Executive Officer
Josh Huntsinger, Agriculture Commissioner/Sealer of Weights and Measures