



**El Dorado County Agricultural Water
Quality Management Corporation**

A member of the Sacramento Valley Water Quality Coalition

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Sent via email: AWLaputz@waterboards.ca.gov

Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670

Attention: Adam W. Laputz

Re: Comments on the Irrigated Lands Regulatory Program (ILRP) Framework

Dear Mr. Laputz,

We appreciate this opportunity to comment on the reference document which will be applicable to our members of the El Dorado County Subwatershed Coalition. Our organization is a member of the Sacramento Valley Water Quality Coalition who also represents our interests.

The El Dorado County Agricultural Water Quality Management Corporation represents 323 individual growers who manage the small farms and ranches that comprise our irrigated agricultural operations. We are located on portions of two Sacramento River sub-watersheds, the American and Cosumnes Rivers, with all irrigated agricultural operations at elevations of 1,000 – 3,500 feet above sea level. The total area of the portions of the two sub-watersheds that we represent is approximately 1.1 million acres. Irrigated agricultural operations represent roughly 3,330 acres or 0.3% of this area.

While our operations are generally concentrated in seven distinct geographic agricultural districts, there are no areas where agriculture is truly the predominant land use. According to the subject PEIR documentation, there are no identified DWR Bulletin 118 ground water basins or sub-basins and there are no SWB Hydrogeologically Vulnerable areas or DPR Groundwater Protection Areas within our county.

Following are our general comments on the proposed ILRP Framework. The detailed comments and recommendations are included as an attachment and are incorporated herein by reference.

1. We appreciate the staff considering our comments about developing a third tier that recognizes a management practices-based approach as an effective program for geographic areas such as ours that pose no threat of leaching to ground water.

2. The El Dorado Subwatershed Coalition meets the criteria established for non-profit, third party entities. Transparency and accountability exist with our members who actively participate in a management practices-based Pilot Program. Reviewing our management practices to identify practices that benefit ground water quality should assure continuation of this program under a Tier 1 tailored approach.
3. Electronic Data Submittals to the Regional Board direct from our members is problematic. Many of the members in this rural county do not have or utilize the internet. Furthermore, our coalition has worked quite well in collecting data from our members, quantifying the data at a summary level, and meeting the requirements of the regulation on a coalition-wide basis. As a Subwatershed Coalition, we have provided this information to the Sacramento Valley Water Quality Coalition by electronic means for incorporation into required management and monitoring reports. This method also protects the private information of our members while providing necessary water quality data that is typical of a non-point source program. We are opposed to requiring electronic submittals by our members.
4. While we support the concept of tailored approaches recommended in the Framework, we know that development of the geographic, organic, or commodity specific Orders will require close cooperation by all parties. A clear pathway between the various tiers and definition of required data to fill the "gaps" will be required.

While the Framework provides flexibility, the first time around will be a challenge to accomplish within the timeframes specified. We recommend that the current Coalition Order be extended to allow sufficient time for each coalition to work with Regional Board staff to draft the long term Order under which we will meet the regulatory objectives.

We appreciate the efforts of staff in considering our previous comments and recommendations and generating a Framework that offers the opportunity for compliance while still maintaining the economic viability of our members. We would welcome the opportunity to work with the Regional Board to develop a tiered approach that continues a management practices-based approach to preserving our excellent surface water quality while providing ground water quality protections.

Sincerely,



Carolyn Mansfield, President

Attachment: As stated

cc: Bruce Houdesheldt, Sacramento Valley Regional Water Quality Coalition
Pamela Creedon, Central Valley Regional Water Quality Control Board

Attachment

El Dorado County Agricultural Water Quality Management Corporation's Comments on the Central Valley Regional Water Quality Control Board Long Term Irrigated Lands Regulatory Program (ILRP) Framework

The El Dorado County Agricultural Water Quality Management Corporation represents 323 individual growers who operate 3,330 acres of irrigated agricultural operations. We are located on portions of two Sacramento River sub-watersheds, the American and Cosumnes Rivers with all irrigated agricultural operations at elevations of 1,000 – 3,500 feet above sea level. The total area of the portions of the two sub-watersheds that we represent is approximately 1.1 million acres. While our operations are generally concentrated in seven distinct geographic districts, there are no areas where agriculture is truly the predominant land use. We share the land with undeveloped open spaces and rural subdivisions of 5-10 acre parcels. According to the subject PEIR documentation, there are no identified DWR Bulletin 118 ground water basins or sub-basins and there are no SWB Hydrogeologically Vulnerable areas or DPR Groundwater Protection Areas within our county.

1. We would like to thank the Regional Board Staff for considering all of our comments on the PEIR and for incorporating some of our recommendations. We are especially relieved to see the Tier 1/no monitoring category. We believe the El Dorado Subwatershed as a geographical area with an existing legally recognized, non-profit third party entity in place readily qualifies for Tier 1 consideration for the following reasons:

- A. 7 years of surface water monitoring data reflecting no impact to surface water as a result of irrigated agricultural operations;
- B. Successful implementation of the Pilot Management Practices Program with owners of over 95% of our irrigated acres having responded to our Management Practices Survey in less than the first year;
- C. No identified groundwater basins or sub-basins or mapped unconfined aquifers resulting in our domestic and municipal wells being located in fractured rock, confined aquifers;
- D. Existing GAMA well test data with no detected pesticides and limited nitrate detections that cannot be attributed to irrigated agricultural operations: and
- E. While our irrigated agricultural operations are generally located within seven identified agriculture districts, they represent less than 0.4% of the total area of the Subwatershed and nowhere could be considered concentrated.

2. Page 14, Nutrient Management – The statement: “The only potential impact associated with nutrient management is additional planning and management costs...” is inaccurate since a key element of Nutrient Management in vineyards is the costly laboratory analysis of plant tissue to determine plant nutrient needs. This additional cost should be addressed.

3. Electronic Data Submissions from growers directly to the Regional Board, pages A-3 and A-14. There are two issues with this requirement:

- A. This as a new requirement, not addressed in the PEIR. A large number of growers do not have ready access to the internet and this could be a financial hardship in order to comply.
 - B. Many growers consider the management practices they use to be proprietary business practices and would not want those practices to be made a part of the public record. Having the third party collect and summarize the data for reporting to the Board should be adequate while providing the grower with the desired confidentiality.
4. Page A-4, Section 4.1 **Threat to Water Quality**, last paragraph, discussion regarding groundwater: There is no consideration for differentiating the approaches of evaluating the potential impact of irrigated agricultural operations on confined versus unconfined aquifers especially since the sources of confined aquifer groundwater cannot easily be determined. See these two terms defined by the USGS at the Water Sciences Glossary of Terms web site: <http://ga.water.usgs.gov/edu/dictionary.html#main>, and discussed at the USGS Water Science for Schools web site: <http://ga.water.usgs.gov/edu/earthgwaquifer.html>.
5. Page A-5, **Tiering of Areas** and page A-8, **Water Quality Threat Factors**. In the El Dorado Subwatershed we have traditional crop growers, irrigated pasture and certified organic operations. The administrative costs of maintaining multiple waivers would be excessive and financially burdensome, especially to small groups with small acreages. We recommend the Regional Board adopt one order that has one conditional waiver of WDRs that encompasses all three of these categories.
6. Page A-16, **MANAGEMENT PLAN AND PRACTICES REQUIREMENTS**, paragraphs, 3, 3.a, and 3.b. Again there is discussion regarding requiring individual growers to provide management practice data directly to the Regional Board. We take exception to this requirement for the reasons stated in our comment 3.B above.
7. Page A-24, **OPTIONAL CERTIFIED FARM WATER QUALITY MANAGEMENT PLAN**. What will be the qualification requirements for certification entities?