

May 21, 2012

Adam Laputz,
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

RE: Eastern San Joaquin River Watershed DRAFT General Order

Dear Mr. Laputz:

The **Dixon / Solano RCD Water Quality Coalition (DSRCDWQC)** represents 581 irrigated agricultural landowners and/or operators in Solano County who are complying with the current Irrigated Lands Program. DSRCDWQC staff members have reviewed the recently released DRAFT Order for growers in the Eastern San Joaquin River Watershed (ESJRW), with the assumption that at least portions of it will be used in the Sacramento Valley DRAFT Order.

While many of the individual requirements under this order were not completely unexpected, the overall workload for coalition staff and individual members and some of the specific deliverables and timetables are unrealistic and we feel they will be ineffective. If the farm evaluation, nutrient budgeting/reporting and erosion control plans are included in our Order in the same format, we are concerned that our extensive work on high priority water quality issues in our area will be stalled while we track down, organize and report management practice inventories, nutrient budgets and erosion control plans.

The most concerning issue is that the tracking and reporting of this information will not lead to improved water quality, but will distract from activities that are doing just that. We are unclear on the specific objectives of the Regional Board in collecting information from farm evaluations, nutrient budgets, erosion control plans except to force individuals to look at their operations in relationship to local water quality results. We think there are much more efficient and effective methods to do this and where we have high priority issues we are already doing this with our growers. If the goal is to make linkages between levels of management practices and water quality results, we can't imagine a farm evaluation process that would be uniform enough to compare implementation levels and at the same time take into consideration the uniqueness of each operation and any related issues. While we agree that farm evaluations, nutrient budgeting and erosion control planning are worthwhile, the collection and attempt to use the information to make linkages to water quality will be cumbersome and confusing.

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If it is too late to address these issues in the ESJRW Order, we hope that the Board will be willing to work with the Sacramento Valley Coalition come up with something that makes more sense for our area. In the meantime we will be talking to our local growers to propose an alternative strategy to meet the Board's objectives that does not reduce the effectiveness of our current program.

Sincerely,



John S. Currey, AFM
District Manager
Dixon Resource Conservation District



Chris Rose
Executive Director
Solano Resource Conservation District