



EL DORADO COUNTY
FARM BUREAU

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Sent via email: jhartman@waterboards.ca.gov

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

Attention: Dr. Jelena Hartman

Re: Comments on the Draft Templates for Farm Evaluation, Nitrogen Management Plan,
Nitrogen Management Plan Summary and Sediment and Erosion Control Plan

Dear Dr. Hartman,

We appreciate this opportunity to comment on the reference document. The El Dorado County Farm Bureau represents over 300 member families who will be affected by the proposed regulation of irrigated agricultural lands. The majority of our irrigated agricultural operations are contained on parcels where the average size of operation is approximately 8 to 10 acres. The irrigated acres currently enrolled in the program totals approximately 3,300 acres. Our farms and ranches are nestled in among recreational uses, undeveloped open space, rural subdivisions, and public roads on 1.1 million acres of land located on the west of the sierras.

The topography and hydrology of the western slope require that deep wells be drilled through fractured rock to water interstices whose water origins are unknown. Within this region of the county, which is included in the proposed regulation, there are no ground water basins or sub-basins identified by DWR Bulletin 118 and there are no Hydrogeologically Vulnerable areas or DPR Groundwater Protection Areas within the county. Since there is no vulnerability for leaching identified in this region, El Dorado County is rendered a low priority area or, stated another way, it presents no threat to ground water quality from agricultural sources.

While we agree that implementation of management practices can be utilized to maintain water quality for both surface and ground water, the proposed templates represent a "one size fits all" approach that is not well suited to El Dorado. The preparation, certification, record keeping and reporting program for these templates imposes a disproportionate burden on the small family farms and ranches that populate El Dorado County.

The El Dorado subwatershed coalition developed and has been performing a management practices-based Pilot Program that has been very successful. The practices identified and verified provide meaningful data and outreach opportunities to work with individual growers to manage for and maintain excellent water quality. In comparison, the proposed templates contain the following shortcomings:

*Protect, promote, and enhance the economic opportunities and long-term viability
for El Dorado County farmers, ranchers, and foresters.*

1. **General Comments.** The templates are confusing and include redundancies. This unfairly adds additional effort on the part of the farmers and the coalitions, whose costs are borne by the growers. There is no alternative for subwatersheds where monitoring is infeasible due to hydrology.
2. **Farm Evaluation.** The evaluation form does not request the source of farm water which may originate from a private well and or purveyor water to service the agricultural areas. Does the form acreage request only refer to irrigated acres? The crop lists are incomplete as crops differ between the valley and the foothills. The farm map requires an indication of potential water discharge points for a program which is supposed to be a non-point source effort.
3. **Nitrogen Management.** The nitrogen plan worksheet is confusing and generally not applicable to foothill agriculture. The template assumes that all crops require nitrogen applications throughout the season. Will members with no nitrogen applications be required to submit plans and reports? Requiring reports for no applications imposes a burden on the growers with no benefit accrued to the program.
4. **Sediment and Erosion Control Plan.** The management and control options for erosion are incomplete. The sediment and erosion control forms requires the farmer to identify areas of "potential discharge". The template requests information on locations subject to frequent water flow events. This is contrary to the coalition non-point source type of management program in previous orders.

A low threat option needs to developed that recognizes those areas, like El Dorado County, that present no risk to groundwater due to the lack of defined basins. We welcome the opportunity to work with the Regional Board and the El Dorado Subwatershed to develop a specific Order that allows a least regulated, tiered approach that would provide ground water protections without sacrificing the economic viability of El Dorado County's small farms and ranches.

Sincerely,



James E. Davies
President

cc: Bruce Houdesheldt, Sacramento Valley Regional Water Quality Coalition
Pamela Creedon, Central Valley Regional Water Quality Control Board
Carolyn Mansfield, El Dorado County Agricultural Water Quality Management Corporation
Kari Fisher, California Farm Bureau Federation