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County of Tulare

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July 31, 2012

Central Valley Regional Water Quality Control Board
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To Whom It May Concern:

Your Board has proposed General Orders for the Southern San Joaquin Valley Water Quality Coalition and Waste Discharge Requirements for the Tulare Lake Basin regulating discharges under the Irrigated Lands Regulatory Program. These Orders will directly and negatively impact Tulare County.

The Tulare County Board of Supervisors opposes the Proposed Order because it is flawed and makes false assumptions. The Order assumes that all irrigation activity discharges to groundwater, the monitoring and reporting measures prescribed in the Order gives no consideration of cost and resulting benefit, and there is a lack of sound scientific evidence to support this program. The grossly negligent demands the Order places on farmers will be detrimental to Tulare County's $5.6 billion industry.

There is no scientific evidence that supports the connection between surface irrigation and discharges to groundwater. There are many factors that must be considered to make such a connection. These include an analysis of soil types, depth to groundwater, field practices, evaporation, and other factors. Burdening agriculture to scientifically disprove the surface to groundwater connection is unacceptable.

The proposed Monitoring and Reporting Program will create additional, unnecessary burdens on irrigators and third party groups and will result in little or no protection of groundwater quality. The program will result in costs over $100 million per year. The work done and the money spent on this program will not result in a single drop of safe water for communities in Tulare County. Instead, the program will result in an expensive bureaucracy.

If the goal of the Regional Board is to protect groundwater and provide safe water to residents this program does not accomplish that ambition. The Irrigated Lands Regulatory Program obligates agriculture to fund a bureaucracy.

Sincerely,

Allen R. Ishida, Chairman
Tulare County Board of Supervisors

Pete Vander Poel, Vice-Chairman
Tulare County Board of Supervisors

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Tulare County Board of Supervisors

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