December 23, 2004

John Minan, Chair
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA 92123

Re: Rainbow Creek Total Maximum Daily Load Plan.

Dear Chair Minan:

The San Diego County Farm Bureau wishes to express its gratitude for the decision by the Regional Water Quality Control Board (RWQCB) to accept additional comments on the Rainbow Creek TMDL through December 29, 2004. That stated, we still hold to our previously submitted comments questioning the declaration of Rainbow Creek as a priority TMDL (San Diego County Farm Bureau letter dated May 8, 2002) and the adequacy of the RWQCB’s efforts to inform and educate the residents and farmers in the Rainbow Creek watershed (San Diego County Farm Bureau letter dated November 24, 2004).

Should the RWQCB choose to adopt the proposed plan for reducing nitrogen and phosphorus in Rainbow Creek it is our hope that the essence of that decision centers on workable solutions, not rigid reporting and enforcement. We believe the opportunity exists to create a model project built on cooperation and flexible management approaches.

The Farm Bureau stands ready to work with governmental and non-governmental organizations in an effort to solicit voluntary support from property owners and farmers in working towards practical solutions to protect Rainbow Creek. We see the County of San Diego, the University of California Cooperative Extension Service, the Mission Resource Conservation District, and trade groups such as the California Avocado Commission as important partners in this effort.

Please allow those tasked with implementation of the Rainbow Creek TMDL the broadest use of management approaches.

Sincerely,

Eric Larson
Executive Director