

From: Diana Peck [diana.peck@kcfb.org]
Sent: Monday, September 27, 2010 12:19 PM
To: ILRP Comments
Subject: Comments on DPEIR for CV Irrigated Lands Regulatory Program
Attachments: Comments on DPEIR for CV ILRP - Bennett.pdf

ILRP Comments
Ms. Megan Smith

Dear Ms. Smith:

On behalf of Kings County Farm Bureau Board Member Tyler Bennett, I am submitting the attached comment letter.

Respectfully,

Diana Peck
Executive Director
Kings County Farm Bureau
870 Greenfield Ave.
Hanford, CA 93230
Ph: 559.584.3557
Fx: 559.584-1614
Email: diana.peck@kcfb.org



Kings County Farm Bureau

870 Greenfield Avenue • Hanford, California 93230

Telephone (559) 584-3557 • FAX (559) 584-1614 • www.kcfb.org

ILRP Comments
Ms. Megan Smith
630 K Street, Ste. 400
Sacramento, CA 95814

SUBJECT: Comments on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program

Dear Ms. Smith:

The Kings County Farm Bureau (KCFB) provides the following significant comments and concerns on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program (DPEIR), the Draft Staff report, the Recommended Program Alternative (RPA), and the Technical Memorandum Concerning the Economic Analysis of the Irrigated Lands Regulatory Program (Economics Analysis). The Kings County Farm Bureau represents more than 700 farm operations and their opinions should be considered in this significant project, since all are affected.

Overall, we found the analysis in the DPEIR to be superficial and not specific to analyzing environmental impacts associated with the five alternatives as well as the RPA. This 2000+ page CEQA alternative document is long, unclear, disjointed, repetitive and has its meaningful components totally camouflaged by voluminous content. KCFB requests the following points noted:

The DPEIR does not analyze the RPA.

The DPEIR analyzes five proposed alternatives. Notwithstanding this extensive environmental review and lengthy period of analysis, the Regional Board staff has come forward in recent weeks with what was first known as a "staff straw proposal" which has been offered in multiple iterations during its short life and is now presented in the CEQA analysis as the recommended program alternative (RPA) – even though it is not one of the alternatives which has been analyzed through CEQA review. When it first emerged as a straw proposal, the agriculture, agribusiness, and ag water quality coalitions were in strong opposition to this late arriving alternative, and particularly voiced opposition if this proposal was not going to be subject to a full CEQA analysis. Notwithstanding such broad opposition, the staff has persisted and now presents this new and recent fresh alternative that did not undergo CEQA review or economic analysis as its preferred version of regulation.

Alternative 2 is a better amendment to the waiver.

Among the five alternatives, Alternative 2 was the best option to strengthen the existing surface water waiver and expand the waiver to groundwater. The extensive CEQA review confirms that Alternative 2 is comparatively superior. Pages 96 through 105 of the CEQA document (and in other locations), evaluates Alternative 2 as compared to the other five alternatives. It is noteworthy that Alternative 2 ranked clearly the highest of all the alternatives.

Officers

Jim Crisp
President

Michael Miya
Vice President

Dino Giacomazzi
Secretary/Treasurer

Board of Directors

Joseph Alcalá

Stan Azevedo

Tyler Bennett

Mary Cameron

Theo de Haan

Ryan Dooley

Chuck Draxler

John Ellis

Pete Hanse

Tim Larson

Gary Lindley

Michael Maciel

John Rodrigues

Steve Walker

Bob Wilson

Frank Zonneveld

The CEQA document makes only one critical remark as to Alternative 2, where it indicates that groundwater monitoring would not be associated with newly created groundwater management plans or for local SB 1938 and Integrated Regional Plans. This criticism is inaccurate as the statutorily created local groundwater quality management plans specifically require groundwater quality monitoring and Alternative 2 expressly calls for monitoring to be also included in the newly created groundwater management plans. Therefore, Alternative 2, without reservation, is the superior alternative.

In addition we have identified the following concerns which we understand other coalitions, such as the Southern San Joaquin Valley Water Quality Coalition (from which these comments are heavily based). These concerns are:

- **Groundwater is now included in the waiver and it presumes all irrigated lands drain to groundwater.** The document on pages 143, et seq. not only expands this surface water waiver to deal with the very complex area of groundwater, but wrongfully asserts that virtually all agricultural lands, including those that do not drain to surface waters of the state, shall be considered as discharging to groundwater. This is simply factually incorrect.
- **The lower San Joaquin Valley has far fewer water quality problems than that represented in the DPEIR.**
- **The timelines are unreasonably short.**
- **The Economic Analysis is inadequate overall and did not evaluate the staff preferred alternative.**
- **Baseline Conditions Are Misrepresented, So the Entire Environmental Analysis Is Tainted.** The DPEIR evidently relies on Alternative 1, the "No Program" Alternative, to represent the existing baseline conditions. However, the "No Program" Alternative misstates what will occur absent any Water Board action. Thus, the DPEIR lacks an accurate baseline against which to judge the environmental impacts of the proposed program.

In closing, Kings County Farm Bureau reiterates that Alternative #2 is the preferred program for the Central Valley Irrigated Lands Regulatory Program. As stated earlier, Alternative 2 is the best option to strengthen the existing surface water waiver.

Respectfully,

Tyler Bennett
Director

From: Diana Peck [diana.peck@kcfb.org]
Sent: Monday, September 27, 2010 12:19 PM
To: ILRP Comments
Subject: Comments on DPEIR for CV Irrigated Lands Regulatory Program
Attachments: Comments on DPEIR for CV ILRP - Bettencourt.pdf

ILRP Comments
Ms. Megan Smith

Dear Ms. Smith:

On behalf of Kings County Farm Bureau Board Member Josh Bettencourt, I am submitting the attached comment letter.

Respectfully,

Diana Peck
Executive Director
Kings County Farm Bureau
870 Greenfield Ave.
Hanford, CA 93230
Ph: 559.584.3557
Fx: 559.584-1614
Email: diana.peck@kcfb.org



Kings County Farm Bureau

870 Greenfield Avenue • Hanford, California 93230

Telephone (559) 584-3557 • FAX (559) 584-1614 • www.kcfb.org

ILRP Comments
Ms. Megan Smith
630 K Street, Ste. 400
Sacramento, CA 95814

SUBJECT: Comments on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program

Dear Ms. Smith:

The Kings County Farm Bureau (KCFB) provides the following significant comments and concerns on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program (DPEIR), the Draft Staff report, the Recommended Program Alternative (RPA), and the Technical Memorandum Concerning the Economic Analysis of the Irrigated Lands Regulatory Program (Economics Analysis). The Kings County Farm Bureau represents more than 700 farm operations and their opinions should be considered in this significant project, since all are affected.

Overall, we found the analysis in the DPEIR to be superficial and not specific to analyzing environmental impacts associated with the five alternatives as well as the RPA. This 2000+ page CEQA alternative document is long, unclear, disjointed, repetitive and has its meaningful components totally camouflaged by voluminous content. KCFB requests the following points noted:

The DPEIR does not analyze the RPA.

The DPEIR analyzes five proposed alternatives. Notwithstanding this extensive environmental review and lengthy period of analysis, the Regional Board staff has come forward in recent weeks with what was first known as a “staff straw proposal” which has been offered in multiple iterations during its short life and is now presented in the CEQA analysis as the recommended program alternative (RPA) – even though it is not one of the alternatives which has been analyzed through CEQA review. When it first emerged as a straw proposal, the agriculture, agribusiness, and ag water quality coalitions were in strong opposition to this late arriving alternative, and particularly voiced opposition if this proposal was not going to be subject to a full CEQA analysis. Notwithstanding such broad opposition, the staff has persisted and now presents this new and recent fresh alternative that did not undergo CEQA review or economic analysis as its preferred version of regulation.

Alternative 2 is a better amendment to the waiver.

Among the five alternatives, Alternative 2 was the best option to strengthen the existing surface water waiver and expand the waiver to groundwater. The extensive CEQA review confirms that Alternative 2 is comparatively superior. Pages 96 through 105 of the CEQA document (and in other locations), evaluates Alternative 2 as compared to the other five alternatives. It is noteworthy that Alternative 2 ranked clearly the highest of all the alternatives.

Officers

Jim Crisp
President

Michael Miya
Vice President

Dino Giacomazzi
Secretary/Treasurer

Board of Directors

Joseph Alcalá

Stan Azevedo

Tyler Bennett

Mary Cameron

Theo de Haan

Ryan Dooley

Chuck Draxler

John Ellis

Pete Hanse

Tim Larson

Gary Lindley

Michael Maciel

John Rodrigues

Steve Walker

Bob Wilson

Frank Zonneveld

The CEQA document makes only one critical remark as to Alternative 2, where it indicates that groundwater monitoring would not be associated with newly created groundwater management plans or for local SB 1938 and Integrated Regional Plans. This criticism is inaccurate as the statutorily created local groundwater quality management plans specifically require groundwater quality monitoring and Alternative 2 expressly calls for monitoring to be also included in the newly created groundwater management plans. Therefore, Alternative 2, without reservation, is the superior alternative.

In addition we have identified the following concerns which we understand other coalitions, such as the Southern San Joaquin Valley Water Quality Coalition (from which these comments are heavily based). These concerns are:

- **Groundwater is now included in the waiver and it presumes all irrigated lands drain to groundwater.** The document on pages 143, et seq. not only expands this surface water waiver to deal with the very complex area of groundwater, but wrongfully asserts that virtually all agricultural lands, including those that do not drain to surface waters of the state, shall be considered as discharging to groundwater. This is simply factually incorrect.
- **The lower San Joaquin Valley has far fewer water quality problems than that represented in the DPEIR.**
- **The timelines are unreasonably short.**
- **The Economic Analysis is inadequate overall and did not evaluate the staff preferred alternative.**
- **Baseline Conditions Are Misrepresented, So the Entire Environmental Analysis Is Tainted.** The DPEIR evidently relies on Alternative 1, the "No Program" Alternative, to represent the existing baseline conditions. However, the "No Program" Alternative misstates what will occur absent any Water Board action. Thus, the DPEIR lacks an accurate baseline against which to judge the environmental impacts of the proposed program.

In closing, Kings County Farm Bureau reiterates that Alternative #2 is the preferred program for the Central Valley Irrigated Lands Regulatory Program. As stated earlier, Alternative 2 is the best option to strengthen the existing surface water waiver.

Respectfully,

Josh Bettencourt
Director

From: Diana Peck [dianapeck@kcfb.org]
Sent: Monday, September 27, 2010 12:20 PM
To: ILRP Comments
Subject: Comments on DPEIR for CV Irrigated Lands Regulatory Program
Attachments: Comments on DPEIR for CV ILRP - Cameron.pdf

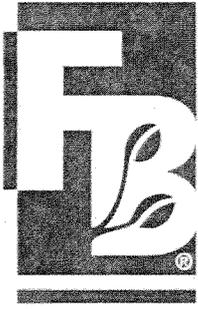
ILRP Comments
Ms. Megan Smith

Dear Ms. Smith:

On behalf of Kings County Farm Bureau Board Member Mary Cameron, I am submitting the attached comment letter.

Respectfully,

Diana Peck
Executive Director
Kings County Farm Bureau
870 Greenfield Ave.
Hanford, CA 93230
Ph: 559.584.3557
Fx: 559.584-1614
Email: dianapeck@kcfb.org



Kings County Farm Bureau

870 Greenfield Avenue • Hanford, California 93230

Telephone (559) 584-3557 • FAX (559) 584-1614 • www.kcfb.org

ILRP Comments
Ms. Megan Smith
630 K Street, Ste. 400
Sacramento, CA 95814

SUBJECT: Comments on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program

Dear Ms. Smith:

The Kings County Farm Bureau (KCFB) provides the following significant comments and concerns on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program (DPEIR), the Draft Staff report, the Recommended Program Alternative (RPA), and the Technical Memorandum Concerning the Economic Analysis of the Irrigated Lands Regulatory Program (Economics Analysis). The Kings County Farm Bureau represents more than 700 farm operations and their opinions should be considered in this significant project, since all are affected.

Overall, we found the analysis in the DPEIR to be superficial and not specific to analyzing environmental impacts associated with the five alternatives as well as the RPA. This 2000+ page CEQA alternative document is long, unclear, disjointed, repetitive and has its meaningful components totally camouflaged by voluminous content. KCFB requests the following points noted:

The DPEIR does not analyze the RPA.

The DPEIR analyzes five proposed alternatives. Notwithstanding this extensive environmental review and lengthy period of analysis, the Regional Board staff has come forward in recent weeks with what was first known as a “staff straw proposal” which has been offered in multiple iterations during its short life and is now presented in the CEQA analysis as the recommended program alternative (RPA) – even though it is not one of the alternatives which has been analyzed through CEQA review. When it first emerged as a straw proposal, the agriculture, agribusiness, and ag water quality coalitions were in strong opposition to this late arriving alternative, and particularly voiced opposition if this proposal was not going to be subject to a full CEQA analysis. Notwithstanding such broad opposition, the staff has persisted and now presents this new and recent fresh alternative that did not undergo CEQA review or economic analysis as its preferred version of regulation.

Alternative 2 is a better amendment to the waiver.

Among the five alternatives, Alternative 2 was the best option to strengthen the existing surface water waiver and expand the waiver to groundwater. The extensive CEQA review confirms that Alternative 2 is comparatively superior. Pages 96 through 105 of the CEQA document (and in other locations), evaluates Alternative 2 as compared to the other five alternatives. It is noteworthy that Alternative 2 ranked clearly the highest of all the alternatives.

Officers

Jim Crisp
President

Michael Miya
Vice President

Dino Giacomazzi
Secretary/Treasurer

Board of Directors

Joseph Alcalá

Stan Azevedo

Tyler Bennett

Mary Cameron

Theo de Haan

Ryan Dooley

Chuck Draxler

John Ellis

Pete Hanse

Tim Larson

Gary Lindley

Michael Maciel

John Rodrigues

Steve Walker

Bob Wilson

Frank Zonneveld

The CEQA document makes only one critical remark as to Alternative 2, where it indicates that groundwater monitoring would not be associated with newly created groundwater management plans or for local SB 1938 and Integrated Regional Plans. This criticism is inaccurate as the statutorily created local groundwater quality management plans specifically require groundwater quality monitoring and Alternative 2 expressly calls for monitoring to be also included in the newly created groundwater management plans. Therefore, Alternative 2, without reservation, is the superior alternative.

In addition we have identified the following concerns which we understand other coalitions, such as the Southern San Joaquin Valley Water Quality Coalition (from which these comments are heavily based). These concerns are:

- **Groundwater is now included in the waiver and it presumes all irrigated lands drain to groundwater.** The document on pages 143, et seq. not only expands this surface water waiver to deal with the very complex area of groundwater, but wrongfully asserts that virtually all agricultural lands, including those that do not drain to surface waters of the state, shall be considered as discharging to groundwater. This is simply factually incorrect.
- **The lower San Joaquin Valley has far fewer water quality problems than that represented in the DPEIR.**
- **The timelines are unreasonably short.**
- **The Economic Analysis is inadequate overall and did not evaluate the staff preferred alternative.**
- **Baseline Conditions Are Misrepresented, So the Entire Environmental Analysis Is Tainted.** The DPEIR evidently relies on Alternative 1, the "No Program" Alternative, to represent the existing baseline conditions. However, the "No Program" Alternative misstates what will occur absent any Water Board action. Thus, the DPEIR lacks an accurate baseline against which to judge the environmental impacts of the proposed program.

In closing, Kings County Farm Bureau reiterates that Alternative #2 is the preferred program for the Central Valley Irrigated Lands Regulatory Program. As stated earlier, Alternative 2 is the best option to strengthen the existing surface water waiver.

Respectfully,

Mary Cameron
Director

From: Diana Peck [dianapeck@kcfb.org]
Sent: Monday, September 27, 2010 12:22 PM
To: ILRP Comments
Subject: Comments on DPEIR for CV Irrigated Lands Regulatory Program
Attachments: Comments on DPEIR for CV ILRP - Crisp.pdf

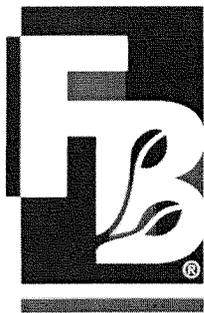
ILRP Comments
Ms. Megan Smith

Dear Ms. Smith:

On behalf of Kings County Farm Bureau President Jim Crisp, I am submitting the attached comment letter.

Respectfully,

Diana Peck
Executive Director
Kings County Farm Bureau
870 Greenfield Ave.
Hanford, CA 93230
Ph: 559.584.3557
Fx: 559.584-1614
Email: dianapeck@kcfb.org



Kings County Farm Bureau

870 Greenfield Avenue • Hanford, California 93230

Telephone (559) 584-3557 • FAX (559) 584-1614 • www.kcfb.org

ILRP Comments
Ms. Megan Smith
630 K Street, Ste. 400
Sacramento, CA 95814

Officers

Jim Crisp
President

Michael Miya
Vice President

Dino Giacomazzi
Secretary/Treasurer

Board of Directors

Joseph Alcalá

Stan Azevedo

Tyler Bennett

Mary Cameron

Theo de Haan

Ryan Dooley

Chuck Draxler

John Ellis

Pete Hanse

Tim Larson

Gary Lindley

Michael Maciel

John Rodrigues

Steve Walker

Bob Wilson

Frank Zonneveld

SUBJECT: Comments on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program

Dear Ms. Smith:

The Kings County Farm Bureau (KCFB) provides the following significant comments and concerns on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program (DPEIR), the Draft Staff report, the Recommended Program Alternative (RPA), and the Technical Memorandum Concerning the Economic Analysis of the Irrigated Lands Regulatory Program (Economics Analysis). The Kings County Farm Bureau represents more than 700 farm operations and their opinions should be considered in this significant project, since all are affected.

Overall, we found the analysis in the DPEIR to be superficial and not specific to analyzing environmental impacts associated with the five alternatives as well as the RPA. This 2000+ page CEQA alternative document is long, unclear, disjointed, repetitive and has its meaningful components totally camouflaged by voluminous content. KCFB requests the following points noted:

The DPEIR does not analyze the RPA.

The DPEIR analyzes five proposed alternatives. Notwithstanding this extensive environmental review and lengthy period of analysis, the Regional Board staff has come forward in recent weeks with what was first known as a “staff straw proposal” which has been offered in multiple iterations during its short life and is now presented in the CEQA analysis as the recommended program alternative (RPA) – even though it is not one of the alternatives which has been analyzed through CEQA review. When it first emerged as a straw proposal, the agriculture, agribusiness, and ag water quality coalitions were in strong opposition to this late arriving alternative, and particularly voiced opposition if this proposal was not going to be subject to a full CEQA analysis. Notwithstanding such broad opposition, the staff has persisted and now presents this new and recent fresh alternative that did not undergo CEQA review or economic analysis as its preferred version of regulation.

Alternative 2 is a better amendment to the waiver.

Among the five alternatives, Alternative 2 was the best option to strengthen the existing surface water waiver and expand the waiver to groundwater. The extensive CEQA review confirms that Alternative 2 is comparatively superior. Pages 96 through 105 of the CEQA document (and in other locations), evaluates Alternative 2 as compared to the other five alternatives. It is noteworthy that Alternative 2 ranked clearly the highest of all the alternatives.

The CEQA document makes only one critical remark as to Alternative 2, where it indicates that groundwater monitoring would not be associated with newly created groundwater management plans or for local SB 1938 and Integrated Regional Plans. This criticism is inaccurate as the statutorily created local groundwater quality management plans specifically require groundwater quality monitoring and Alternative 2 expressly calls for monitoring to be also included in the newly created groundwater management plans. Therefore, Alternative 2, without reservation, is the superior alternative.

In addition we have identified the following concerns which we understand other coalitions, such as the Southern San Joaquin Valley Water Quality Coalition (from which these comments are heavily based). These concerns are:

- **Groundwater is now included in the waiver and it presumes all irrigated lands drain to groundwater.** The document on pages 143, et seq. not only expands this surface water waiver to deal with the very complex area of groundwater, but wrongfully asserts that virtually all agricultural lands, including those that do not drain to surface waters of the state, shall be considered as discharging to groundwater. This is simply factually incorrect.
- **The lower San Joaquin Valley has far fewer water quality problems than that represented in the DPEIR.**
- **The timelines are unreasonably short.**
- **The Economic Analysis is inadequate overall and did not evaluate the staff preferred alternative.**
- **Baseline Conditions Are Misrepresented, So the Entire Environmental Analysis Is Tainted.** The DPEIR evidently relies on Alternative 1, the "No Program" Alternative, to represent the existing baseline conditions. However, the "No Program" Alternative misstates what will occur absent any Water Board action. Thus, the DPEIR lacks an accurate baseline against which to judge the environmental impacts of the proposed program.

In closing, Kings County Farm Bureau reiterates that Alternative #2 is the preferred program for the Central Valley Irrigated Lands Regulatory Program. As stated earlier, Alternative 2 is the best option to strengthen the existing surface water waiver.

Respectfully,

Jim Crisp
President

From: Diana Peck [dianapeck@kcfb.org]
Sent: Monday, September 27, 2010 12:23 PM
To: ILRP Comments
Subject: Comments on DPEIR for CV Irrigated Lands Regulatory Program
Attachments: Comments on DPEIR for CV ILRP - deHaan.pdf

ILRP Comments
Ms. Megan Smith

Dear Ms. Smith:

On behalf of Kings County Farm Bureau Board Member Theo de Haan, I am submitting the attached comment letter.

Respectfully,

Diana Peck
Executive Director
Kings County Farm Bureau
870 Greenfield Ave.
Hanford, CA 93230
Ph: 559.584.3557
Fx: 559.584-1614
Email: dianapeck@kcfb.org



Kings County Farm Bureau

870 Greenfield Avenue ♦ Hanford, California 93230

Telephone (559) 584-3557 ♦ FAX (559) 584-1614 ♦ www.kcfb.org

ILRP Comments
Ms. Megan Smith
630 K Street, Ste. 400
Sacramento, CA 95814

SUBJECT: Comments on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program

Dear Ms. Smith:

The Kings County Farm Bureau (KCFB) provides the following significant comments and concerns on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program (DPEIR), the Draft Staff report, the Recommended Program Alternative (RPA), and the Technical Memorandum Concerning the Economic Analysis of the Irrigated Lands Regulatory Program (Economics Analysis). The Kings County Farm Bureau represents more than 700 farm operations and their opinions should be considered in this significant project, since all are affected.

Overall, we found the analysis in the DPEIR to be superficial and not specific to analyzing environmental impacts associated with the five alternatives as well as the RPA. This 2000+ page CEQA alternative document is long, unclear, disjointed, repetitive and has its meaningful components totally camouflaged by voluminous content. KCFB requests the following points noted:

The DPEIR does not analyze the RPA.

The DPEIR analyzes five proposed alternatives. Notwithstanding this extensive environmental review and lengthy period of analysis, the Regional Board staff has come forward in recent weeks with what was first known as a “staff straw proposal” which has been offered in multiple iterations during its short life and is now presented in the CEQA analysis as the recommended program alternative (RPA) – even though it is not one of the alternatives which has been analyzed through CEQA review. When it first emerged as a straw proposal, the agriculture, agribusiness, and ag water quality coalitions were in strong opposition to this late arriving alternative, and particularly voiced opposition if this proposal was not going to be subject to a full CEQA analysis. Notwithstanding such broad opposition, the staff has persisted and now presents this new and recent fresh alternative that did not undergo CEQA review or economic analysis as its preferred version of regulation.

Alternative 2 is a better amendment to the waiver.

Among the five alternatives, Alternative 2 was the best option to strengthen the existing surface water waiver and expand the waiver to groundwater. The extensive CEQA review confirms that Alternative 2 is comparatively superior. Pages 96 through 105 of the CEQA document (and in other locations), evaluates Alternative 2 as compared to the other five alternatives. It is noteworthy that Alternative 2 ranked clearly the highest of all the alternatives.

Officers

Jim Crisp
President

Michael Miya
Vice President

Dino Giacomazzi
Secretary/Treasurer

Board of Directors

Joseph Alcala

Stan Azevedo

Tyler Bennett

Mary Cameron

Theo de Haan

Ryan Dooley

Chuck Draxler

John Ellis

Pete Hanse

Tim Larson

Gary Lindley

Michael Maciel

John Rodrigues

Steve Walker

Bob Wilson

Frank Zonneveld

The CEQA document makes only one critical remark as to Alternative 2, where it indicates that groundwater monitoring would not be associated with newly created groundwater management plans or for local SB 1938 and Integrated Regional Plans. This criticism is inaccurate as the statutorily created local groundwater quality management plans specifically require groundwater quality monitoring and Alternative 2 expressly calls for monitoring to be also included in the newly created groundwater management plans. Therefore, Alternative 2, without reservation, is the superior alternative.

In addition we have identified the following concerns which we understand other coalitions, such as the Southern San Joaquin Valley Water Quality Coalition (from which these comments are heavily based). These concerns are:

- **Groundwater is now included in the waiver and it presumes all irrigated lands drain to groundwater.** The document on pages 143, et seq. not only expands this surface water waiver to deal with the very complex area of groundwater, but wrongfully asserts that virtually all agricultural lands, including those that do not drain to surface waters of the state, shall be considered as discharging to groundwater. This is simply factually incorrect.
- **The lower San Joaquin Valley has far fewer water quality problems than that represented in the DPEIR.**
- **The timelines are unreasonably short.**
- **The Economic Analysis is inadequate overall and did not evaluate the staff preferred alternative.**
- **Baseline Conditions Are Misrepresented, So the Entire Environmental Analysis Is Tainted.** The DPEIR evidently relies on Alternative 1, the "No Program" Alternative, to represent the existing baseline conditions. However, the "No Program" Alternative misstates what will occur absent any Water Board action. Thus, the DPEIR lacks an accurate baseline against which to judge the environmental impacts of the proposed program.

In closing, Kings County Farm Bureau reiterates that Alternative #2 is the preferred program for the Central Valley Irrigated Lands Regulatory Program. As stated earlier, Alternative 2 is the best option to strengthen the existing surface water waiver.

Respectfully,

Theo de Haan
Director

From: Diana Peck [dianapec@kcfb.org]
Sent: Monday, September 27, 2010 12:24 PM
To: ILRP Comments
Subject: Comments on DPEIR for CV Irrigated Lands Regulatory Program
Attachments: Comments on DPEIR for CV ILRP - Dooley.pdf

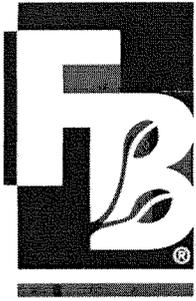
ILRP Comments
Ms. Megan Smith

Dear Ms. Smith:

On behalf of Kings County Farm Bureau Board Member Ryan Dooley, I am submitting the attached comment letter.

Respectfully,

Diana Peck
Executive Director
Kings County Farm Bureau
870 Greenfield Ave.
Hanford, CA 93230
Ph: 559.584.3557
Fx: 559.584-1614
Email: dianapec@kcfb.org



Kings County Farm Bureau

870 Greenfield Avenue • Hanford, California 93230

Telephone (559) 584-3557 • FAX (559) 584-1614 • www.kcfeb.org

ILRP Comments

Ms. Megan Smith

630 K Street, Ste. 400

Sacramento, CA 95814

Officers

Jim Crisp
President

Michael Miya
Vice President

Dino Giacomazzi
Secretary/Treasurer

Board of Directors

Joseph Alcalá

Stan Azevedo

Tyler Bennett

Mary Cameron

Theo de Haan

Ryan Dooley

Chuck Draxler

John Ellis

Pete Hanse

Tim Larson

Gary Lindley

Michael Maciel

John Rodrigues

Steve Walker

Bob Wilson

Frank Zonneveld

SUBJECT: Comments on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program

Dear Ms. Smith:

The Kings County Farm Bureau (KCFB) provides the following significant comments and concerns on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program (DPEIR), the Draft Staff report, the Recommended Program Alternative (RPA), and the Technical Memorandum Concerning the Economic Analysis of the Irrigated Lands Regulatory Program (Economics Analysis). The Kings County Farm Bureau represents more than 700 farm operations and their opinions should be considered in this significant project, since all are affected.

Overall, we found the analysis in the DPEIR to be superficial and not specific to analyzing environmental impacts associated with the five alternatives as well as the RPA. This 2000+ page CEQA alternative document is long, unclear, disjointed, repetitive and has its meaningful components totally camouflaged by voluminous content. KCFB requests the following points noted:

The DPEIR does not analyze the RPA.

The DPEIR analyzes five proposed alternatives. Notwithstanding this extensive environmental review and lengthy period of analysis, the Regional Board staff has come forward in recent weeks with what was first known as a “staff straw proposal” which has been offered in multiple iterations during its short life and is now presented in the CEQA analysis as the recommended program alternative (RPA) – even though it is not one of the alternatives which has been analyzed through CEQA review. When it first emerged as a straw proposal, the agriculture, agribusiness, and ag water quality coalitions were in strong opposition to this late arriving alternative, and particularly voiced opposition if this proposal was not going to be subject to a full CEQA analysis. Notwithstanding such broad opposition, the staff has persisted and now presents this new and recent fresh alternative that did not undergo CEQA review or economic analysis as its preferred version of regulation.

Alternative 2 is a better amendment to the waiver.

Among the five alternatives, Alternative 2 was the best option to strengthen the existing surface water waiver and expand the waiver to groundwater. The extensive CEQA review confirms that Alternative 2 is comparatively superior. Pages 96 through 105 of the CEQA document (and in other locations), evaluates Alternative 2 as compared to the other five alternatives. It is noteworthy that Alternative 2 ranked clearly the highest of all the alternatives.

The CEQA document makes only one critical remark as to Alternative 2, where it indicates that groundwater monitoring would not be associated with newly created groundwater management plans or for local SB 1938 and Integrated Regional Plans. This criticism is inaccurate as the statutorily created local groundwater quality management plans specifically require groundwater quality monitoring and Alternative 2 expressly calls for monitoring to be also included in the newly created groundwater management plans. Therefore, Alternative 2, without reservation, is the superior alternative.

In addition we have identified the following concerns which we understand other coalitions, such as the Southern San Joaquin Valley Water Quality Coalition (from which these comments are heavily based). These concerns are:

- **Groundwater is now included in the waiver and it presumes all irrigated lands drain to groundwater.** The document on pages 143, et seq. not only expands this surface water waiver to deal with the very complex area of groundwater, but wrongfully asserts that virtually all agricultural lands, including those that do not drain to surface waters of the state, shall be considered as discharging to groundwater. This is simply factually incorrect.
- **The lower San Joaquin Valley has far fewer water quality problems than that represented in the DPEIR.**
- **The timelines are unreasonably short.**
- **The Economic Analysis is inadequate overall and did not evaluate the staff preferred alternative.**
- **Baseline Conditions Are Misrepresented, So the Entire Environmental Analysis Is Tainted.** The DPEIR evidently relies on Alternative 1, the "No Program" Alternative, to represent the existing baseline conditions. However, the "No Program" Alternative misstates what will occur absent any Water Board action. Thus, the DPEIR lacks an accurate baseline against which to judge the environmental impacts of the proposed program.

In closing, Kings County Farm Bureau reiterates that Alternative #2 is the preferred program for the Central Valley Irrigated Lands Regulatory Program. As stated earlier, Alternative 2 is the best option to strengthen the existing surface water waiver.

Respectfully,

Ryan Dooley
Director

From: Diana Peck [diana.peck@kcfb.org]
Sent: Monday, September 27, 2010 12:25 PM
To: ILRP Comments
Subject: Comments on DPEIR for CV Irrigated Lands Regulatory Program
Attachments: Comments on DPEIR for CV ILRP - Draxler.pdf

ILRP Comments
Ms. Megan Smith

Dear Ms. Smith:

On behalf of Kings County Farm Bureau Board Member Chuck Draxler, I am submitting the attached comment letter.

Respectfully,

Diana Peck
Executive Director
Kings County Farm Bureau
870 Greenfield Ave.
Hanford, CA 93230
Ph: 559.584.3557
Fx: 559.584-1614
Email: diana.peck@kcfb.org



Kings County Farm Bureau

870 Greenfield Avenue • Hanford, California 93230
Telephone (559) 584-3557 • FAX (559) 584-1614 • www.kcfb.org

ILRP Comments
Ms. Megan Smith
630 K Street, Ste. 400
Sacramento, CA 95814

SUBJECT: Comments on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program

Dear Ms. Smith:

The Kings County Farm Bureau (KCFB) provides the following significant comments and concerns on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program (DPEIR), the Draft Staff report, the Recommended Program Alternative (RPA), and the Technical Memorandum Concerning the Economic Analysis of the Irrigated Lands Regulatory Program (Economics Analysis). The Kings County Farm Bureau represents more than 700 farm operations and their opinions should be considered in this significant project, since all are affected.

Overall, we found the analysis in the DPEIR to be superficial and not specific to analyzing environmental impacts associated with the five alternatives as well as the RPA. This 2000+ page CEQA alternative document is long, unclear, disjointed, repetitive and has its meaningful components totally camouflaged by voluminous content. KCFB requests the following points noted:

The DPEIR does not analyze the RPA.

The DPEIR analyzes five proposed alternatives. Notwithstanding this extensive environmental review and lengthy period of analysis, the Regional Board staff has come forward in recent weeks with what was first known as a “staff straw proposal” which has been offered in multiple iterations during its short life and is now presented in the CEQA analysis as the recommended program alternative (RPA) – even though it is not one of the alternatives which has been analyzed through CEQA review. When it first emerged as a straw proposal, the agriculture, agribusiness, and ag water quality coalitions were in strong opposition to this late arriving alternative, and particularly voiced opposition if this proposal was not going to be subject to a full CEQA analysis. Notwithstanding such broad opposition, the staff has persisted and now presents this new and recent fresh alternative that did not undergo CEQA review or economic analysis as its preferred version of regulation.

Alternative 2 is a better amendment to the waiver.

Among the five alternatives, Alternative 2 was the best option to strengthen the existing surface water waiver and expand the waiver to groundwater. The extensive CEQA review confirms that Alternative 2 is comparatively superior. Pages 96 through 105 of the CEQA document (and in other locations), evaluates Alternative 2 as compared to the other five alternatives. It is noteworthy that Alternative 2 ranked clearly the highest of all the alternatives.

Officers

Jim Crisp
President

Michael Miya
Vice President

Dino Giacomazzi
Secretary/Treasurer

Board of Directors

Joseph Alcalá

Stan Azevedo

Tyler Bennett

Mary Cameron

Theo de Haan

Ryan Dooley

Chuck Draxler

John Ellis

Pete Hanse

Tim Larson

Gary Lindley

Michael Maciel

John Rodrigues

Steve Walker

Bob Wilson

Frank Zonneveld

The CEQA document makes only one critical remark as to Alternative 2, where it indicates that groundwater monitoring would not be associated with newly created groundwater management plans or for local SB 1938 and Integrated Regional Plans. This criticism is inaccurate as the statutorily created local groundwater quality management plans specifically require groundwater quality monitoring and Alternative 2 expressly calls for monitoring to be also included in the newly created groundwater management plans. Therefore, Alternative 2, without reservation, is the superior alternative.

In addition we have identified the following concerns which we understand other coalitions, such as the Southern San Joaquin Valley Water Quality Coalition (from which these comments are heavily based). These concerns are:

- **Groundwater is now included in the waiver and it presumes all irrigated lands drain to groundwater.** The document on pages 143, et seq. not only expands this surface water waiver to deal with the very complex area of groundwater, but wrongfully asserts that virtually all agricultural lands, including those that do not drain to surface waters of the state, shall be considered as discharging to groundwater. This is simply factually incorrect.
- **The lower San Joaquin Valley has far fewer water quality problems than that represented in the DPEIR.**
- **The timelines are unreasonably short.**
- **The Economic Analysis is inadequate overall and did not evaluate the staff preferred alternative.**
- **Baseline Conditions Are Misrepresented, So the Entire Environmental Analysis Is Tainted.** The DPEIR evidently relies on Alternative 1, the "No Program" Alternative, to represent the existing baseline conditions. However, the "No Program" Alternative misstates what will occur absent any Water Board action. Thus, the DPEIR lacks an accurate baseline against which to judge the environmental impacts of the proposed program.

In closing, Kings County Farm Bureau reiterates that Alternative #2 is the preferred program for the Central Valley Irrigated Lands Regulatory Program. As stated earlier, Alternative 2 is the best option to strengthen the existing surface water waiver.

Respectfully,

Chuck Draxler
Director

From: Diana Peck [diana.peck@kcfb.org]
Sent: Monday, September 27, 2010 12:25 PM
To: ILRP Comments
Subject: Comments on DPEIR for CV Irrigated Lands Regulatory Program
Attachments: Comments on DPEIR for CV ILRP - Ellis.pdf

ILRP Comments
Ms. Megan Smith

Dear Ms. Smith:

On behalf of Kings County Farm Bureau Board Member John Ellis, I am submitting the attached comment letter.

Respectfully,

Diana Peck
Executive Director
Kings County Farm Bureau
870 Greenfield Ave.
Hanford, CA 93230
Ph: 559.584.3557
Fx: 559.584-1614
Email: diana.peck@kcfb.org



Kings County Farm Bureau

870 Greenfield Avenue ♦ Hanford, California 93230

Telephone (559) 584-3557 ♦ FAX (559) 584-1614 ♦ www.kcfeb.org

ILRP Comments

Ms. Megan Smith

630 K Street, Ste. 400

Sacramento, CA 95814

Officers

Jim Crisp
President

Michael Miya
Vice President

Dino Giacomazzi
Secretary/Treasurer

Board of Directors

Joseph Alcalá

Stan Azevedo

Tyler Bennett

Mary Cameron

Theo de Haan

Ryan Dooley

Chuck Draxler

John Ellis

Pete Hanse

Tim Larson

Gary Lindley

Michael Maciel

John Rodrigues

Steve Walker

Bob Wilson

Frank Zonneveld

SUBJECT: Comments on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program

Dear Ms. Smith:

The Kings County Farm Bureau (KCFB) provides the following significant comments and concerns on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program (DPEIR), the Draft Staff report, the Recommended Program Alternative (RPA), and the Technical Memorandum Concerning the Economic Analysis of the Irrigated Lands Regulatory Program (Economics Analysis). The Kings County Farm Bureau represents more than 700 farm operations and their opinions should be considered in this significant project, since all are affected.

Overall, we found the analysis in the DPEIR to be superficial and not specific to analyzing environmental impacts associated with the five alternatives as well as the RPA. This 2000+ page CEQA alternative document is long, unclear, disjointed, repetitive and has its meaningful components totally camouflaged by voluminous content. KCFB requests the following points noted:

The DPEIR does not analyze the RPA.

The DPEIR analyzes five proposed alternatives. Notwithstanding this extensive environmental review and lengthy period of analysis, the Regional Board staff has come forward in recent weeks with what was first known as a “staff straw proposal” which has been offered in multiple iterations during its short life and is now presented in the CEQA analysis as the recommended program alternative (RPA) – even though it is not one of the alternatives which has been analyzed through CEQA review. When it first emerged as a straw proposal, the agriculture, agribusiness, and ag water quality coalitions were in strong opposition to this late arriving alternative, and particularly voiced opposition if this proposal was not going to be subject to a full CEQA analysis. Notwithstanding such broad opposition, the staff has persisted and now presents this new and recent fresh alternative that did not undergo CEQA review or economic analysis as its preferred version of regulation.

Alternative 2 is a better amendment to the waiver.

Among the five alternatives, Alternative 2 was the best option to strengthen the existing surface water waiver and expand the waiver to groundwater. The extensive CEQA review confirms that Alternative 2 is comparatively superior. Pages 96 through 105 of the CEQA document (and in other locations), evaluates Alternative 2 as compared to the other five alternatives. It is noteworthy that Alternative 2 ranked clearly the highest of all the alternatives.

The CEQA document makes only one critical remark as to Alternative 2, where it indicates that groundwater monitoring would not be associated with newly created groundwater management plans or for local SB 1938 and Integrated Regional Plans. This criticism is inaccurate as the statutorily created local groundwater quality management plans specifically require groundwater quality monitoring and Alternative 2 expressly calls for monitoring to be also included in the newly created groundwater management plans. Therefore, Alternative 2, without reservation, is the superior alternative.

In addition we have identified the following concerns which we understand other coalitions, such as the Southern San Joaquin Valley Water Quality Coalition (from which these comments are heavily based). These concerns are:

- **Groundwater is now included in the waiver and it presumes all irrigated lands drain to groundwater.** The document on pages 143, et seq. not only expands this surface water waiver to deal with the very complex area of groundwater, but wrongfully asserts that virtually all agricultural lands, including those that do not drain to surface waters of the state, shall be considered as discharging to groundwater. This is simply factually incorrect.
- **The lower San Joaquin Valley has far fewer water quality problems than that represented in the DPEIR.**
- **The timelines are unreasonably short.**
- **The Economic Analysis is inadequate overall and did not evaluate the staff preferred alternative.**
- **Baseline Conditions Are Misrepresented, So the Entire Environmental Analysis Is Tainted.** The DPEIR evidently relies on Alternative 1, the "No Program" Alternative, to represent the existing baseline conditions. However, the "No Program" Alternative misstates what will occur absent any Water Board action. Thus, the DPEIR lacks an accurate baseline against which to judge the environmental impacts of the proposed program.

In closing, Kings County Farm Bureau reiterates that Alternative #2 is the preferred program for the Central Valley Irrigated Lands Regulatory Program. As stated earlier, Alternative 2 is the best option to strengthen the existing surface water waiver.

Respectfully,

John Ellis
Director

From: Diana Peck [diana.peck@kcfb.org]
Sent: Monday, September 27, 2010 12:26 PM
To: ILRP Comments
Subject: Comments on DPEIR for CV Irrigated Lands Regulatory Program
Attachments: Comments on DPEIR for CV ILRP - Giacomazzi.pdf

ILRP Comments
Ms. Megan Smith

Dear Ms. Smith:

On behalf of Kings County Farm Bureau Board Member Dino Giacomazzi, I am submitting the attached comment letter.

Respectfully,

Diana Peck
Executive Director
Kings County Farm Bureau
870 Greenfield Ave.
Hanford, CA 93230
Ph: 559.584.3557
Fx: 559.584-1614
Email: diana.peck@kcfb.org



Kings County Farm Bureau

870 Greenfield Avenue • Hanford, California 93230
Telephone (559) 584-3557 • FAX (559) 584-1614 • www.kcfb.org

ILRP Comments
Ms. Megan Smith
630 K Street, Ste. 400
Sacramento, CA 95814

Officers

Jim Crisp
President

Michael Miya
Vice President

Dino Giacomazzi
Secretary/Treasurer

Board of Directors

Joseph Alcalá

Stan Azevedo

Tyler Bennett

Mary Cameron

Theo de Haan

Ryan Dooley

Chuck Draxler

John Ellis

Pete Hanse

Tim Larson

Gary Lindley

Michael Maciel

John Rodrigues

Steve Walker

Bob Wilson

Frank Zonneveld

SUBJECT: Comments on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program

Dear Ms. Smith:

The Kings County Farm Bureau (KCFB) provides the following significant comments and concerns on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program (DPEIR), the Draft Staff report, the Recommended Program Alternative (RPA), and the Technical Memorandum Concerning the Economic Analysis of the Irrigated Lands Regulatory Program (Economics Analysis). The Kings County Farm Bureau represents more than 700 farm operations and their opinions should be considered in this significant project, since all are affected.

Overall, we found the analysis in the DPEIR to be superficial and not specific to analyzing environmental impacts associated with the five alternatives as well as the RPA. This 2000+ page CEQA alternative document is long, unclear, disjointed, repetitive and has its meaningful components totally camouflaged by voluminous content. KCFB requests the following points noted:

The DPEIR does not analyze the RPA.

The DPEIR analyzes five proposed alternatives. Notwithstanding this extensive environmental review and lengthy period of analysis, the Regional Board staff has come forward in recent weeks with what was first known as a "staff straw proposal" which has been offered in multiple iterations during its short life and is now presented in the CEQA analysis as the recommended program alternative (RPA) – even though it is not one of the alternatives which has been analyzed through CEQA review. When it first emerged as a straw proposal, the agriculture, agribusiness, and ag water quality coalitions were in strong opposition to this late arriving alternative, and particularly voiced opposition if this proposal was not going to be subject to a full CEQA analysis. Notwithstanding such broad opposition, the staff has persisted and now presents this new and recent fresh alternative that did not undergo CEQA review or economic analysis as its preferred version of regulation.

Alternative 2 is a better amendment to the waiver.

Among the five alternatives, Alternative 2 was the best option to strengthen the existing surface water waiver and expand the waiver to groundwater. The extensive CEQA review confirms that Alternative 2 is comparatively superior. Pages 96 through 105 of the CEQA document (and in other locations), evaluates Alternative 2 as compared to the other five alternatives. It is noteworthy that Alternative 2 ranked clearly the highest of all the alternatives.

The CEQA document makes only one critical remark as to Alternative 2, where it indicates that groundwater monitoring would not be associated with newly created groundwater management plans or for local SB 1938 and Integrated Regional Plans. This criticism is inaccurate as the statutorily created local groundwater quality management plans specifically require groundwater quality monitoring and Alternative 2 expressly calls for monitoring to be also included in the newly created groundwater management plans. Therefore, Alternative 2, without reservation, is the superior alternative.

In addition we have identified the following concerns which we understand other coalitions, such as the Southern San Joaquin Valley Water Quality Coalition (from which these comments are heavily based). These concerns are:

- **Groundwater is now included in the waiver and it presumes all irrigated lands drain to groundwater.** The document on pages 143, et seq. not only expands this surface water waiver to deal with the very complex area of groundwater, but wrongfully asserts that virtually all agricultural lands, including those that do not drain to surface waters of the state, shall be considered as discharging to groundwater. This is simply factually incorrect.
- **The lower San Joaquin Valley has far fewer water quality problems than that represented in the DPEIR.**
- **The timelines are unreasonably short.**
- **The Economic Analysis is inadequate overall and did not evaluate the staff preferred alternative.**
- **Baseline Conditions Are Misrepresented, So the Entire Environmental Analysis Is Tainted.** The DPEIR evidently relies on Alternative 1, the "No Program" Alternative, to represent the existing baseline conditions. However, the "No Program" Alternative misstates what will occur absent any Water Board action. Thus, the DPEIR lacks an accurate baseline against which to judge the environmental impacts of the proposed program.

In closing, Kings County Farm Bureau reiterates that Alternative #2 is the preferred program for the Central Valley Irrigated Lands Regulatory Program. As stated earlier, Alternative 2 is the best option to strengthen the existing surface water waiver.

Respectfully,

Dino Giacomazzi
Secretary-Treasurer

From: Diana Peck [dianapeck@kcfb.org]
Sent: Monday, September 27, 2010 12:27 PM
To: ILRP Comments
Subject: Comments on DPEIR for CV Irrigated Lands Regulatory Program
Attachments: Comments on DPEIR for CV ILRP - Hanse.pdf

ILRP Comments
Ms. Megan Smith

Dear Ms. Smith:

On behalf of Kings County Farm Bureau Board Member Pete Hanse, I am submitting the attached comment letter.

Respectfully,

Diana Peck
Executive Director
Kings County Farm Bureau
870 Greenfield Ave.
Hanford, CA 93230
Ph: 559.584.3557
Fx: 559.584-1614
Email: dianapeck@kcfb.org



Kings County Farm Bureau

870 Greenfield Avenue • Hanford, California 93230

Telephone (559) 584-3557 • FAX (559) 584-1614 • www.kcfb.org

ILRP Comments
Ms. Megan Smith
630 K Street, Ste. 400
Sacramento, CA 95814

SUBJECT: Comments on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program

Dear Ms. Smith:

The Kings County Farm Bureau (KCFB) provides the following significant comments and concerns on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program (DPEIR), the Draft Staff report, the Recommended Program Alternative (RPA), and the Technical Memorandum Concerning the Economic Analysis of the Irrigated Lands Regulatory Program (Economics Analysis). The Kings County Farm Bureau represents more than 700 farm operations and their opinions should be considered in this significant project, since all are affected.

Overall, we found the analysis in the DPEIR to be superficial and not specific to analyzing environmental impacts associated with the five alternatives as well as the RPA. This 2000+ page CEQA alternative document is long, unclear, disjointed, repetitive and has its meaningful components totally camouflaged by voluminous content. KCFB requests the following points noted:

The DPEIR does not analyze the RPA.

The DPEIR analyzes five proposed alternatives. Notwithstanding this extensive environmental review and lengthy period of analysis, the Regional Board staff has come forward in recent weeks with what was first known as a “staff straw proposal” which has been offered in multiple iterations during its short life and is now presented in the CEQA analysis as the recommended program alternative (RPA) – even though it is not one of the alternatives which has been analyzed through CEQA review. When it first emerged as a straw proposal, the agriculture, agribusiness, and ag water quality coalitions were in strong opposition to this late arriving alternative, and particularly voiced opposition if this proposal was not going to be subject to a full CEQA analysis. Notwithstanding such broad opposition, the staff has persisted and now presents this new and recent fresh alternative that did not undergo CEQA review or economic analysis as its preferred version of regulation.

Alternative 2 is a better amendment to the waiver.

Among the five alternatives, Alternative 2 was the best option to strengthen the existing surface water waiver and expand the waiver to groundwater. The extensive CEQA review confirms that Alternative 2 is comparatively superior. Pages 96 through 105 of the CEQA document (and in other locations), evaluates Alternative 2 as compared to the other five alternatives. It is noteworthy that Alternative 2 ranked clearly the highest of all the alternatives.

Officers

Jim Crisp
President

Michael Miya
Vice President

Dino Giacomazzi
Secretary/Treasurer

Board of Directors

Joseph Alcalá

Stan Azevedo

Tyler Bennett

Mary Cameron

Theo de Haan

Ryan Dooley

Chuck Draxler

John Ellis

Pete Hanse

Tim Larson

Gary Lindley

Michael Maciel

John Rodrigues

Steve Walker

Bob Wilson

Frank Zonneveld

The CEQA document makes only one critical remark as to Alternative 2, where it indicates that groundwater monitoring would not be associated with newly created groundwater management plans or for local SB 1938 and Integrated Regional Plans. This criticism is inaccurate as the statutorily created local groundwater quality management plans specifically require groundwater quality monitoring and Alternative 2 expressly calls for monitoring to be also included in the newly created groundwater management plans. Therefore, Alternative 2, without reservation, is the superior alternative.

In addition we have identified the following concerns which we understand other coalitions, such as the Southern San Joaquin Valley Water Quality Coalition (from which these comments are heavily based). These concerns are:

- **Groundwater is now included in the waiver and it presumes all irrigated lands drain to groundwater.** The document on pages 143, et seq. not only expands this surface water waiver to deal with the very complex area of groundwater, but wrongfully asserts that virtually all agricultural lands, including those that do not drain to surface waters of the state, shall be considered as discharging to groundwater. This is simply factually incorrect.
- **The lower San Joaquin Valley has far fewer water quality problems than that represented in the DPEIR.**
- **The timelines are unreasonably short.**
- **The Economic Analysis is inadequate overall and did not evaluate the staff preferred alternative.**
- **Baseline Conditions Are Misrepresented, So the Entire Environmental Analysis Is Tainted.** The DPEIR evidently relies on Alternative 1, the "No Program" Alternative, to represent the existing baseline conditions. However, the "No Program" Alternative misstates what will occur absent any Water Board action. Thus, the DPEIR lacks an accurate baseline against which to judge the environmental impacts of the proposed program.

In closing, Kings County Farm Bureau reiterates that Alternative #2 is the preferred program for the Central Valley Irrigated Lands Regulatory Program. As stated earlier, Alternative 2 is the best option to strengthen the existing surface water waiver.

Respectfully,

Pete Hanse
Director

From: Diana Peck [dianapeck@kcfb.org]
Sent: Monday, September 27, 2010 12:28 PM
To: ILRP Comments
Subject: Comments on DPEIR for CV Irrigated Lands Regulatory Program
Attachments: Comments on DPEIR for CV ILRP - Lindley.pdf

ILRP Comments
Ms. Megan Smith

Dear Ms. Smith:

On behalf of Kings County Farm Bureau Board Member Gary Lindley, I am submitting the attached comment letter.

Respectfully,

Diana Peck
Executive Director
Kings County Farm Bureau
870 Greenfield Ave.
Hanford, CA 93230
Ph: 559.584.3557
Fx: 559.584-1614
Email: dianapeck@kcfb.org



Kings County Farm Bureau

870 Greenfield Avenue ♦ Hanford, California 93230
Telephone (559) 584-3557 ♦ FAX (559) 584-1614 ♦ www.kcfb.org

ILRP Comments
Ms. Megan Smith
630 K Street, Ste. 400
Sacramento, CA 95814

SUBJECT: Comments on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program

Dear Ms. Smith:

The Kings County Farm Bureau (KCFB) provides the following significant comments and concerns on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program (DPEIR), the Draft Staff report, the Recommended Program Alternative (RPA), and the Technical Memorandum Concerning the Economic Analysis of the Irrigated Lands Regulatory Program (Economics Analysis). The Kings County Farm Bureau represents more than 700 farm operations and their opinions should be considered in this significant project, since all are affected.

Overall, we found the analysis in the DPEIR to be superficial and not specific to analyzing environmental impacts associated with the five alternatives as well as the RPA. This 2000+ page CEQA alternative document is long, unclear, disjointed, repetitive and has its meaningful components totally camouflaged by voluminous content. KCFB requests the following points noted:

The DPEIR does not analyze the RPA.

The DPEIR analyzes five proposed alternatives. Notwithstanding this extensive environmental review and lengthy period of analysis, the Regional Board staff has come forward in recent weeks with what was first known as a “staff straw proposal” which has been offered in multiple iterations during its short life and is now presented in the CEQA analysis as the recommended program alternative (RPA) – even though it is not one of the alternatives which has been analyzed through CEQA review. When it first emerged as a straw proposal, the agriculture, agribusiness, and ag water quality coalitions were in strong opposition to this late arriving alternative, and particularly voiced opposition if this proposal was not going to be subject to a full CEQA analysis. Notwithstanding such broad opposition, the staff has persisted and now presents this new and recent fresh alternative that did not undergo CEQA review or economic analysis as its preferred version of regulation.

Alternative 2 is a better amendment to the waiver.

Among the five alternatives, Alternative 2 was the best option to strengthen the existing surface water waiver and expand the waiver to groundwater. The extensive CEQA review confirms that Alternative 2 is comparatively superior. Pages 96 through 105 of the CEQA document (and in other locations), evaluates Alternative 2 as compared to the other five alternatives. It is noteworthy that Alternative 2 ranked clearly the highest of all the alternatives.

Officers

Jim Crisp
President

Michael Miya
Vice President

Dino Giacomazzi
Secretary/Treasurer

Board of Directors

Joseph Alcalá

Stan Azevedo

Tyler Bennett

Mary Cameron

Theo de Haan

Ryan Dooley

Chuck Draxler

John Ellis

Pete Hanse

Tim Larson

Gary Lindley

Michael Maciel

John Rodrigues

Steve Walker

Bob Wilson

Frank Zonneveld

The CEQA document makes only one critical remark as to Alternative 2, where it indicates that groundwater monitoring would not be associated with newly created groundwater management plans or for local SB 1938 and Integrated Regional Plans. This criticism is inaccurate as the statutorily created local groundwater quality management plans specifically require groundwater quality monitoring and Alternative 2 expressly calls for monitoring to be also included in the newly created groundwater management plans. Therefore, Alternative 2, without reservation, is the superior alternative.

In addition we have identified the following concerns which we understand other coalitions, such as the Southern San Joaquin Valley Water Quality Coalition (from which these comments are heavily based). These concerns are:

- **Groundwater is now included in the waiver and it presumes all irrigated lands drain to groundwater.** The document on pages 143, et seq. not only expands this surface water waiver to deal with the very complex area of groundwater, but wrongfully asserts that virtually all agricultural lands, including those that do not drain to surface waters of the state, shall be considered as discharging to groundwater. This is simply factually incorrect.
- **The lower San Joaquin Valley has far fewer water quality problems than that represented in the DPEIR.**
- **The timelines are unreasonably short.**
- **The Economic Analysis is inadequate overall and did not evaluate the staff preferred alternative.**
- **Baseline Conditions Are Misrepresented, So the Entire Environmental Analysis Is Tainted.** The DPEIR evidently relies on Alternative 1, the "No Program" Alternative, to represent the existing baseline conditions. However, the "No Program" Alternative misstates what will occur absent any Water Board action. Thus, the DPEIR lacks an accurate baseline against which to judge the environmental impacts of the proposed program.

In closing, Kings County Farm Bureau reiterates that Alternative #2 is the preferred program for the Central Valley Irrigated Lands Regulatory Program. As stated earlier, Alternative 2 is the best option to strengthen the existing surface water waiver.

Respectfully,

Gary Lindley
Director

From: Diana Peck [dianapec@kcfb.org]
Sent: Monday, September 27, 2010 12:28 PM
To: ILRP Comments
Subject: Comments on DPEIR for CV Irrigated Lands Regulatory Program
Attachments: Comments on DPEIR for CV ILRP - Maciel.pdf

ILRP Comments
Ms. Megan Smith

Dear Ms. Smith:

On behalf of Kings County Farm Bureau Board Member Michael Maciel, I am submitting the attached comment letter.

Respectfully,

Diana Peck
Executive Director
Kings County Farm Bureau
870 Greenfield Ave.
Hanford, CA 93230
Ph: 559.584.3557
Fx: 559.584-1614
Email: dianapec@kcfb.org



Kings County Farm Bureau

870 Greenfield Avenue • Hanford, California 93230

Telephone (559) 584-3557 • FAX (559) 584-1614 • www.kcfeb.org

ILRP Comments
Ms. Megan Smith
630 K Street, Ste. 400
Sacramento, CA 95814

Officers

Jim Crisp
President

Michael Miya
Vice President

Dino Giacomazzi
Secretary/Treasurer

Board of Directors

Joseph Alcalá

Stan Azevedo

Tyler Bennett

Mary Cameron

Theo de Haan

Ryan Dooley

Chuck Draxler

John Ellis

Pete Hanse

Tim Larson

Gary Lindley

Michael Maciel

John Rodrigues

Steve Walker

Bob Wilson

Frank Zonneveld

SUBJECT: Comments on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program

Dear Ms. Smith:

The Kings County Farm Bureau (KCFB) provides the following significant comments and concerns on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program (DPEIR), the Draft Staff report, the Recommended Program Alternative (RPA), and the Technical Memorandum Concerning the Economic Analysis of the Irrigated Lands Regulatory Program (Economics Analysis). The Kings County Farm Bureau represents more than 700 farm operations and their opinions should be considered in this significant project, since all are affected.

Overall, we found the analysis in the DPEIR to be superficial and not specific to analyzing environmental impacts associated with the five alternatives as well as the RPA. This 2000+ page CEQA alternative document is long, unclear, disjointed, repetitive and has its meaningful components totally camouflaged by voluminous content. KCFB requests the following points noted:

The DPEIR does not analyze the RPA.

The DPEIR analyzes five proposed alternatives. Notwithstanding this extensive environmental review and lengthy period of analysis, the Regional Board staff has come forward in recent weeks with what was first known as a “staff straw proposal” which has been offered in multiple iterations during its short life and is now presented in the CEQA analysis as the recommended program alternative (RPA) – even though it is not one of the alternatives which has been analyzed through CEQA review. When it first emerged as a straw proposal, the agriculture, agribusiness, and ag water quality coalitions were in strong opposition to this late arriving alternative, and particularly voiced opposition if this proposal was not going to be subject to a full CEQA analysis. Notwithstanding such broad opposition, the staff has persisted and now presents this new and recent fresh alternative that did not undergo CEQA review or economic analysis as its preferred version of regulation.

Alternative 2 is a better amendment to the waiver.

Among the five alternatives, Alternative 2 was the best option to strengthen the existing surface water waiver and expand the waiver to groundwater. The extensive CEQA review confirms that Alternative 2 is comparatively superior. Pages 96 through 105 of the CEQA document (and in other locations), evaluates Alternative 2 as compared to the other five alternatives. It is noteworthy that Alternative 2 ranked clearly the highest of all the alternatives.

The CEQA document makes only one critical remark as to Alternative 2, where it indicates that groundwater monitoring would not be associated with newly created groundwater management plans or for local SB 1938 and Integrated Regional Plans. This criticism is inaccurate as the statutorily created local groundwater quality management plans specifically require groundwater quality monitoring and Alternative 2 expressly calls for monitoring to be also included in the newly created groundwater management plans. Therefore, Alternative 2, without reservation, is the superior alternative.

In addition we have identified the following concerns which we understand other coalitions, such as the Southern San Joaquin Valley Water Quality Coalition (from which these comments are heavily based). These concerns are:

- **Groundwater is now included in the waiver and it presumes all irrigated lands drain to groundwater.** The document on pages 143, et seq. not only expands this surface water waiver to deal with the very complex area of groundwater, but wrongfully asserts that virtually all agricultural lands, including those that do not drain to surface waters of the state, shall be considered as discharging to groundwater. This is simply factually incorrect.
- **The lower San Joaquin Valley has far fewer water quality problems than that represented in the DPEIR.**
- **The timelines are unreasonably short.**
- **The Economic Analysis is inadequate overall and did not evaluate the staff preferred alternative.**
- **Baseline Conditions Are Misrepresented, So the Entire Environmental Analysis Is Tainted.** The DPEIR evidently relies on Alternative 1, the "No Program" Alternative, to represent the existing baseline conditions. However, the "No Program" Alternative misstates what will occur absent any Water Board action. Thus, the DPEIR lacks an accurate baseline against which to judge the environmental impacts of the proposed program.

In closing, Kings County Farm Bureau reiterates that Alternative #2 is the preferred program for the Central Valley Irrigated Lands Regulatory Program. As stated earlier, Alternative 2 is the best option to strengthen the existing surface water waiver.

Respectfully,

Michael Maciel
Director

From: Diana Peck [dianapeck@kcfb.org]
Sent: Monday, September 27, 2010 12:29 PM
To: ILRP Comments
Subject: Comments on DPEIR for CV Irrigated Lands Regulatory Program
Attachments: Comments on DPEIR for CV ILRP - Miya.pdf

ILRP Comments
Ms. Megan Smith

Dear Ms. Smith:

On behalf of Kings County Farm Bureau Vice President Michael Miya, I am submitting the attached comment letter.

Respectfully,

Diana Peck
Executive Director
Kings County Farm Bureau
870 Greenfield Ave.
Hanford, CA 93230
Ph: 559.584.3557
Fx: 559.584-1614
Email: dianapeck@kcfb.org



Kings County Farm Bureau

870 Greenfield Avenue • Hanford, California 93230
Telephone (559) 584-3557 • FAX (559) 584-1614 • www.kcfb.org

ILRP Comments
Ms. Megan Smith
630 K Street, Ste. 400
Sacramento, CA 95814

Officers

Jim Crisp
President

Michael Miya
Vice President

Dino Giacomazzi
Secretary/Treasurer

Board of Directors

Joseph Alcalá

Stan Azevedo

Tyler Bennett

Mary Cameron

Theo de Haan

Ryan Dooley

Chuck Draxler

John Ellis

Pete Hanse

Tim Larson

Gary Lindley

Michael Maciel

John Rodrigues

Steve Walker

Bob Wilson

Frank Zonneveld

SUBJECT: Comments on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program

Dear Ms. Smith:

The Kings County Farm Bureau (KCFB) provides the following significant comments and concerns on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program (DPEIR), the Draft Staff report, the Recommended Program Alternative (RPA), and the Technical Memorandum Concerning the Economic Analysis of the Irrigated Lands Regulatory Program (Economics Analysis). The Kings County Farm Bureau represents more than 700 farm operations and their opinions should be considered in this significant project, since all are affected.

Overall, we found the analysis in the DPEIR to be superficial and not specific to analyzing environmental impacts associated with the five alternatives as well as the RPA. This 2000+ page CEQA alternative document is long, unclear, disjointed, repetitive and has its meaningful components totally camouflaged by voluminous content. KCFB requests the following points noted:

The DPEIR does not analyze the RPA.

The DPEIR analyzes five proposed alternatives. Notwithstanding this extensive environmental review and lengthy period of analysis, the Regional Board staff has come forward in recent weeks with what was first known as a “staff straw proposal” which has been offered in multiple iterations during its short life and is now presented in the CEQA analysis as the recommended program alternative (RPA) – even though it is not one of the alternatives which has been analyzed through CEQA review. When it first emerged as a straw proposal, the agriculture, agribusiness, and ag water quality coalitions were in strong opposition to this late arriving alternative, and particularly voiced opposition if this proposal was not going to be subject to a full CEQA analysis. Notwithstanding such broad opposition, the staff has persisted and now presents this new and recent fresh alternative that did not undergo CEQA review or economic analysis as its preferred version of regulation.

Alternative 2 is a better amendment to the waiver.

Among the five alternatives, Alternative 2 was the best option to strengthen the existing surface water waiver and expand the waiver to groundwater. The extensive CEQA review confirms that Alternative 2 is comparatively superior. Pages 96 through 105 of the CEQA document (and in other locations), evaluates Alternative 2 as compared to the other five alternatives. It is noteworthy that Alternative 2 ranked clearly the highest of all the alternatives.

The CEQA document makes only one critical remark as to Alternative 2, where it indicates that groundwater monitoring would not be associated with newly created groundwater management plans or for local SB 1938 and Integrated Regional Plans. This criticism is inaccurate as the statutorily created local groundwater quality management plans specifically require groundwater quality monitoring and Alternative 2 expressly calls for monitoring to be also included in the newly created groundwater management plans. Therefore, Alternative 2, without reservation, is the superior alternative.

In addition we have identified the following concerns which we understand other coalitions, such as the Southern San Joaquin Valley Water Quality Coalition (from which these comments are heavily based). These concerns are:

- **Groundwater is now included in the waiver and it presumes all irrigated lands drain to groundwater.** The document on pages 143, et seq. not only expands this surface water waiver to deal with the very complex area of groundwater, but wrongfully asserts that virtually all agricultural lands, including those that do not drain to surface waters of the state, shall be considered as discharging to groundwater. This is simply factually incorrect.
- **The lower San Joaquin Valley has far fewer water quality problems than that represented in the DPEIR.**
- **The timelines are unreasonably short.**
- **The Economic Analysis is inadequate overall and did not evaluate the staff preferred alternative.**
- **Baseline Conditions Are Misrepresented, So the Entire Environmental Analysis Is Tainted.** The DPEIR evidently relies on Alternative 1, the "No Program" Alternative, to represent the existing baseline conditions. However, the "No Program" Alternative misstates what will occur absent any Water Board action. Thus, the DPEIR lacks an accurate baseline against which to judge the environmental impacts of the proposed program.

In closing, Kings County Farm Bureau reiterates that Alternative #2 is the preferred program for the Central Valley Irrigated Lands Regulatory Program. As stated earlier, Alternative 2 is the best option to strengthen the existing surface water waiver.

Respectfully,

Michael Miya
Vice President

From: Diana Peck [dianapec@kcfb.org]
Sent: Monday, September 27, 2010 12:30 PM
To: ILRP Comments
Subject: Comments on DPEIR for CV Irrigated Lands Regulatory Program
Attachments: Comments on DPEIR for CV ILRP - Rodrigues.pdf

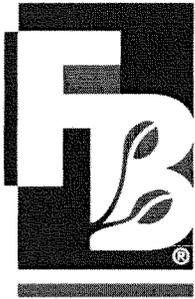
ILRP Comments
Ms. Megan Smith

Dear Ms. Smith:

On behalf of Kings County Farm Bureau Board Member John Rodrigues, I am submitting the attached comment letter.

Respectfully,

Diana Peck
Executive Director
Kings County Farm Bureau
870 Greenfield Ave.
Hanford, CA 93230
Ph: 559.584.3557
Fx: 559.584-1614
Email: dianapec@kcfb.org



Kings County Farm Bureau

870 Greenfield Avenue • Hanford, California 93230

Telephone (559) 584-3557 • FAX (559) 584-1614 • www.kcfb.org

ILRP Comments
Ms. Megan Smith
630 K Street, Ste. 400
Sacramento, CA 95814

Officers

Jim Crisp
President

Michael Miya
Vice President

Dino Giacomazzi
Secretary/Treasurer

Board of Directors

Joseph Alcalá

Stan Azevedo

Tyler Bennett

Mary Cameron

Theo de Haan

Ryan Dooley

Chuck Draxler

John Ellis

Pete Hanse

Tim Larson

Gary Lindley

Michael Maciel

John Rodrigues

Steve Walker

Bob Wilson

Frank Zonneveld

SUBJECT: Comments on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program

Dear Ms. Smith:

The Kings County Farm Bureau (KCFB) provides the following significant comments and concerns on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program (DPEIR), the Draft Staff report, the Recommended Program Alternative (RPA), and the Technical Memorandum Concerning the Economic Analysis of the Irrigated Lands Regulatory Program (Economics Analysis). The Kings County Farm Bureau represents more than 700 farm operations and their opinions should be considered in this significant project, since all are affected.

Overall, we found the analysis in the DPEIR to be superficial and not specific to analyzing environmental impacts associated with the five alternatives as well as the RPA. This 2000+ page CEQA alternative document is long, unclear, disjointed, repetitive and has its meaningful components totally camouflaged by voluminous content. KCFB requests the following points noted:

The DPEIR does not analyze the RPA.

The DPEIR analyzes five proposed alternatives. Notwithstanding this extensive environmental review and lengthy period of analysis, the Regional Board staff has come forward in recent weeks with what was first known as a “staff straw proposal” which has been offered in multiple iterations during its short life and is now presented in the CEQA analysis as the recommended program alternative (RPA) – even though it is not one of the alternatives which has been analyzed through CEQA review. When it first emerged as a straw proposal, the agriculture, agribusiness, and ag water quality coalitions were in strong opposition to this late arriving alternative, and particularly voiced opposition if this proposal was not going to be subject to a full CEQA analysis. Notwithstanding such broad opposition, the staff has persisted and now presents this new and recent fresh alternative that did not undergo CEQA review or economic analysis as its preferred version of regulation.

Alternative 2 is a better amendment to the waiver.

Among the five alternatives, Alternative 2 was the best option to strengthen the existing surface water waiver and expand the waiver to groundwater. The extensive CEQA review confirms that Alternative 2 is comparatively superior. Pages 96 through 105 of the CEQA document (and in other locations), evaluates Alternative 2 as compared to the other five alternatives. It is noteworthy that Alternative 2 ranked clearly the highest of all the alternatives.

The CEQA document makes only one critical remark as to Alternative 2, where it indicates that groundwater monitoring would not be associated with newly created groundwater management plans or for local SB 1938 and Integrated Regional Plans. This criticism is inaccurate as the statutorily created local groundwater quality management plans specifically require groundwater quality monitoring and Alternative 2 expressly calls for monitoring to be also included in the newly created groundwater management plans. Therefore, Alternative 2, without reservation, is the superior alternative.

In addition we have identified the following concerns which we understand other coalitions, such as the Southern San Joaquin Valley Water Quality Coalition (from which these comments are heavily based). These concerns are:

- **Groundwater is now included in the waiver and it presumes all irrigated lands drain to groundwater.** The document on pages 143, et seq. not only expands this surface water waiver to deal with the very complex area of groundwater, but wrongfully asserts that virtually all agricultural lands, including those that do not drain to surface waters of the state, shall be considered as discharging to groundwater. This is simply factually incorrect.
- **The lower San Joaquin Valley has far fewer water quality problems than that represented in the DPEIR.**
- **The timelines are unreasonably short.**
- **The Economic Analysis is inadequate overall and did not evaluate the staff preferred alternative.**
- **Baseline Conditions Are Misrepresented, So the Entire Environmental Analysis Is Tainted.** The DPEIR evidently relies on Alternative 1, the "No Program" Alternative, to represent the existing baseline conditions. However, the "No Program" Alternative misstates what will occur absent any Water Board action. Thus, the DPEIR lacks an accurate baseline against which to judge the environmental impacts of the proposed program.

In closing, Kings County Farm Bureau reiterates that Alternative #2 is the preferred program for the Central Valley Irrigated Lands Regulatory Program. As stated earlier, Alternative 2 is the best option to strengthen the existing surface water waiver.

Respectfully,

John Rodrigues
Director

From: Diana Peck [diana.peck@kcfb.org]
Sent: Monday, September 27, 2010 12:30 PM
To: ILRP Comments
Subject: Comments on DPEIR for CV Irrigated Lands Regulatory Program
Attachments: Comments on DPEIR for CV ILRP - Walker.pdf

ILRP Comments
Ms. Megan Smith

Dear Ms. Smith:

On behalf of Kings County Farm Bureau Board Member Steve Walker, I am submitting the attached comment letter.

Respectfully,

Diana Peck
Executive Director
Kings County Farm Bureau
870 Greenfield Ave.
Hanford, CA 93230
Ph: 559.584.3557
Fx: 559.584-1614
Email: diana.peck@kcfb.org



Kings County Farm Bureau

870 Greenfield Avenue • Hanford, California 93230
Telephone (559) 584-3557 • FAX (559) 584-1614 • www.kcfb.org

ILRP Comments
Ms. Megan Smith
630 K Street, Ste. 400
Sacramento, CA 95814

SUBJECT: Comments on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program

Dear Ms. Smith:

The Kings County Farm Bureau (KCFB) provides the following significant comments and concerns on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program (DPEIR), the Draft Staff report, the Recommended Program Alternative (RPA), and the Technical Memorandum Concerning the Economic Analysis of the Irrigated Lands Regulatory Program (Economics Analysis). The Kings County Farm Bureau represents more than 700 farm operations and their opinions should be considered in this significant project, since all are affected.

Overall, we found the analysis in the DPEIR to be superficial and not specific to analyzing environmental impacts associated with the five alternatives as well as the RPA. This 2000+ page CEQA alternative document is long, unclear, disjointed, repetitive and has its meaningful components totally camouflaged by voluminous content. KCFB requests the following points noted:

The DPEIR does not analyze the RPA.

The DPEIR analyzes five proposed alternatives. Notwithstanding this extensive environmental review and lengthy period of analysis, the Regional Board staff has come forward in recent weeks with what was first known as a “staff straw proposal” which has been offered in multiple iterations during its short life and is now presented in the CEQA analysis as the recommended program alternative (RPA) – even though it is not one of the alternatives which has been analyzed through CEQA review. When it first emerged as a straw proposal, the agriculture, agribusiness, and ag water quality coalitions were in strong opposition to this late arriving alternative, and particularly voiced opposition if this proposal was not going to be subject to a full CEQA analysis. Notwithstanding such broad opposition, the staff has persisted and now presents this new and recent fresh alternative that did not undergo CEQA review or economic analysis as its preferred version of regulation.

Alternative 2 is a better amendment to the waiver.

Among the five alternatives, Alternative 2 was the best option to strengthen the existing surface water waiver and expand the waiver to groundwater. The extensive CEQA review confirms that Alternative 2 is comparatively superior. Pages 96 through 105 of the CEQA document (and in other locations), evaluates Alternative 2 as compared to the other five alternatives. It is noteworthy that Alternative 2 ranked clearly the highest of all the alternatives.

Officers

Jim Crisp
President

Michael Miya
Vice President

Dino Giacomazzi
Secretary/Treasurer

Board of Directors

Joseph Alcalá

Stan Azevedo

Tyler Bennett

Mary Cameron

Theo de Haan

Ryan Dooley

Chuck Draxler

John Ellis

Pete Hanse

Tim Larson

Gary Lindley

Michael Maciel

John Rodrigues

Steve Walker

Bob Wilson

Frank Zonneveld

The CEQA document makes only one critical remark as to Alternative 2, where it indicates that groundwater monitoring would not be associated with newly created groundwater management plans or for local SB 1938 and Integrated Regional Plans. This criticism is inaccurate as the statutorily created local groundwater quality management plans specifically require groundwater quality monitoring and Alternative 2 expressly calls for monitoring to be also included in the newly created groundwater management plans. Therefore, Alternative 2, without reservation, is the superior alternative.

In addition we have identified the following concerns which we understand other coalitions, such as the Southern San Joaquin Valley Water Quality Coalition (from which these comments are heavily based). These concerns are:

- **Groundwater is now included in the waiver and it presumes all irrigated lands drain to groundwater.** The document on pages 143, et seq. not only expands this surface water waiver to deal with the very complex area of groundwater, but wrongfully asserts that virtually all agricultural lands, including those that do not drain to surface waters of the state, shall be considered as discharging to groundwater. This is simply factually incorrect.
- **The lower San Joaquin Valley has far fewer water quality problems than that represented in the DPEIR.**
- **The timelines are unreasonably short.**
- **The Economic Analysis is inadequate overall and did not evaluate the staff preferred alternative.**
- **Baseline Conditions Are Misrepresented, So the Entire Environmental Analysis Is Tainted.** The DPEIR evidently relies on Alternative 1, the "No Program" Alternative, to represent the existing baseline conditions. However, the "No Program" Alternative misstates what will occur absent any Water Board action. Thus, the DPEIR lacks an accurate baseline against which to judge the environmental impacts of the proposed program.

In closing, Kings County Farm Bureau reiterates that Alternative #2 is the preferred program for the Central Valley Irrigated Lands Regulatory Program. As stated earlier, Alternative 2 is the best option to strengthen the existing surface water waiver.

Respectfully,

Steve Walker
Director

From: Diana Peck [diana.peck@kcfb.org]
Sent: Monday, September 27, 2010 12:31 PM
To: ILRP Comments
Subject: Comments on DPEIR for CV Irrigated Lands Regulatory Program
Attachments: Comments on DPEIR for CV ILRP - Wilson.pdf

ILRP Comments
Ms. Megan Smith

Dear Ms. Smith:

On behalf of Kings County Farm Bureau Board Member Bob Wilson, I am submitting the attached comment letter.

Respectfully,

Diana Peck
Executive Director
Kings County Farm Bureau
870 Greenfield Ave.
Hanford, CA 93230
Ph: 559.584.3557
Fx: 559.584-1614
Email: diana.peck@kcfb.org



Kings County Farm Bureau

870 Greenfield Avenue • Hanford, California 93230
Telephone (559) 584-3557 • FAX (559) 584-1614 • www.kcfb.org

ILRP Comments
Ms. Megan Smith
630 K Street, Ste. 400
Sacramento, CA 95814

SUBJECT: Comments on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program

Dear Ms. Smith:

The Kings County Farm Bureau (KCFB) provides the following significant comments and concerns on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program (DPEIR), the Draft Staff report, the Recommended Program Alternative (RPA), and the Technical Memorandum Concerning the Economic Analysis of the Irrigated Lands Regulatory Program (Economics Analysis). The Kings County Farm Bureau represents more than 700 farm operations and their opinions should be considered in this significant project, since all are affected.

Overall, we found the analysis in the DPEIR to be superficial and not specific to analyzing environmental impacts associated with the five alternatives as well as the RPA. This 2000+ page CEQA alternative document is long, unclear, disjointed, repetitive and has its meaningful components totally camouflaged by voluminous content. KCFB requests the following points noted:

The DPEIR does not analyze the RPA.

The DPEIR analyzes five proposed alternatives. Notwithstanding this extensive environmental review and lengthy period of analysis, the Regional Board staff has come forward in recent weeks with what was first known as a “staff straw proposal” which has been offered in multiple iterations during its short life and is now presented in the CEQA analysis as the recommended program alternative (RPA) – even though it is not one of the alternatives which has been analyzed through CEQA review. When it first emerged as a straw proposal, the agriculture, agribusiness, and ag water quality coalitions were in strong opposition to this late arriving alternative, and particularly voiced opposition if this proposal was not going to be subject to a full CEQA analysis. Notwithstanding such broad opposition, the staff has persisted and now presents this new and recent fresh alternative that did not undergo CEQA review or economic analysis as its preferred version of regulation.

Alternative 2 is a better amendment to the waiver.

Among the five alternatives, Alternative 2 was the best option to strengthen the existing surface water waiver and expand the waiver to groundwater. The extensive CEQA review confirms that Alternative 2 is comparatively superior. Pages 96 through 105 of the CEQA document (and in other locations), evaluates Alternative 2 as compared to the other five alternatives. It is noteworthy that Alternative 2 ranked clearly the highest of all the alternatives.

Officers

Jim Crisp
President

Michael Miya
Vice President

Dino Giacomazzi
Secretary/Treasurer

Board of Directors

Joseph Alcalá

Stan Azevedo

Tyler Bennett

Mary Cameron

Theo de Haan

Ryan Dooley

Chuck Draxler

John Ellis

Pete Hanse

Tim Larson

Gary Lindley

Michael Maciel

John Rodrigues

Steve Walker

Bob Wilson

Frank Zonneveld

The CEQA document makes only one critical remark as to Alternative 2, where it indicates that groundwater monitoring would not be associated with newly created groundwater management plans or for local SB 1938 and Integrated Regional Plans. This criticism is inaccurate as the statutorily created local groundwater quality management plans specifically require groundwater quality monitoring and Alternative 2 expressly calls for monitoring to be also included in the newly created groundwater management plans. Therefore, Alternative 2, without reservation, is the superior alternative.

In addition we have identified the following concerns which we understand other coalitions, such as the Southern San Joaquin Valley Water Quality Coalition (from which these comments are heavily based). These concerns are:

- **Groundwater is now included in the waiver and it presumes all irrigated lands drain to groundwater.** The document on pages 143, et seq. not only expands this surface water waiver to deal with the very complex area of groundwater, but wrongfully asserts that virtually all agricultural lands, including those that do not drain to surface waters of the state, shall be considered as discharging to groundwater. This is simply factually incorrect.
- **The lower San Joaquin Valley has far fewer water quality problems than that represented in the DPEIR.**
- **The timelines are unreasonably short.**
- **The Economic Analysis is inadequate overall and did not evaluate the staff preferred alternative.**
- **Baseline Conditions Are Misrepresented, So the Entire Environmental Analysis Is Tainted.** The DPEIR evidently relies on Alternative 1, the "No Program" Alternative, to represent the existing baseline conditions. However, the "No Program" Alternative misstates what will occur absent any Water Board action. Thus, the DPEIR lacks an accurate baseline against which to judge the environmental impacts of the proposed program.

In closing, Kings County Farm Bureau reiterates that Alternative #2 is the preferred program for the Central Valley Irrigated Lands Regulatory Program. As stated earlier, Alternative 2 is the best option to strengthen the existing surface water waiver.

Respectfully,

Bob Wilson
Director

From: Diana Peck [diana.peck@kcfb.org]
Sent: Monday, September 27, 2010 12:32 PM
To: ILRP Comments
Subject: Comments on DPEIR for CV Irrigated Lands Regulatory Program
Attachments: Comments on DPEIR for CV ILRP - Zonneveld.pdf

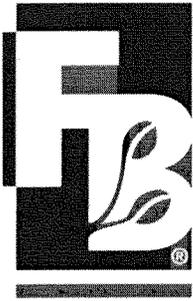
ILRP Comments
Ms. Megan Smith

Dear Ms. Smith:

On behalf of Kings County Farm Bureau Board Member Frank Zonneveld, I am submitting the attached comment letter.

Respectfully,

Diana Peck
Executive Director
Kings County Farm Bureau
870 Greenfield Ave.
Hanford, CA 93230
Ph: 559.584.3557
Fx: 559.584-1614
Email: diana.peck@kcfb.org



Kings County Farm Bureau

870 Greenfield Avenue • Hanford, California 93230
Telephone (559) 584-3557 • FAX (559) 584-1614 • www.kcfb.org

ILRP Comments
Ms. Megan Smith
630 K Street, Ste. 400
Sacramento, CA 95814

SUBJECT: Comments on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program

Dear Ms. Smith:

The Kings County Farm Bureau (KCFB) provides the following significant comments and concerns on the Draft Program Environmental Impact Report for the Central Valley Irrigated Lands Regulatory Program (DPEIR), the Draft Staff report, the Recommended Program Alternative (RPA), and the Technical Memorandum Concerning the Economic Analysis of the Irrigated Lands Regulatory Program (Economics Analysis). The Kings County Farm Bureau represents more than 700 farm operations and their opinions should be considered in this significant project, since all are affected.

Overall, we found the analysis in the DPEIR to be superficial and not specific to analyzing environmental impacts associated with the five alternatives as well as the RPA. This 2000+ page CEQA alternative document is long, unclear, disjointed, repetitive and has its meaningful components totally camouflaged by voluminous content. KCFB requests the following points noted:

The DPEIR does not analyze the RPA.

The DPEIR analyzes five proposed alternatives. Notwithstanding this extensive environmental review and lengthy period of analysis, the Regional Board staff has come forward in recent weeks with what was first known as a “staff straw proposal” which has been offered in multiple iterations during its short life and is now presented in the CEQA analysis as the recommended program alternative (RPA) – even though it is not one of the alternatives which has been analyzed through CEQA review. When it first emerged as a straw proposal, the agriculture, agribusiness, and ag water quality coalitions were in strong opposition to this late arriving alternative, and particularly voiced opposition if this proposal was not going to be subject to a full CEQA analysis. Notwithstanding such broad opposition, the staff has persisted and now presents this new and recent fresh alternative that did not undergo CEQA review or economic analysis as its preferred version of regulation.

Alternative 2 is a better amendment to the waiver.

Among the five alternatives, Alternative 2 was the best option to strengthen the existing surface water waiver and expand the waiver to groundwater. The extensive CEQA review confirms that Alternative 2 is comparatively superior. Pages 96 through 105 of the CEQA document (and in other locations), evaluates Alternative 2 as compared to the other five alternatives. It is noteworthy that Alternative 2 ranked clearly the highest of all the alternatives.

Officers

Jim Crisp
President

Michael Miya
Vice President

Dino Giacomazzi
Secretary/Treasurer

Board of Directors

Joseph Alcala

Stan Azevedo

Tyler Bennett

Mary Cameron

Theo de Haan

Ryan Dooley

Chuck Draxler

John Ellis

Pete Hanse

Tim Larson

Gary Lindley

Michael Maciel

John Rodrigues

Steve Walker

Bob Wilson

Frank Zonneveld

The CEQA document makes only one critical remark as to Alternative 2, where it indicates that groundwater monitoring would not be associated with newly created groundwater management plans or for local SB 1938 and Integrated Regional Plans. This criticism is inaccurate as the statutorily created local groundwater quality management plans specifically require groundwater quality monitoring and Alternative 2 expressly calls for monitoring to be also included in the newly created groundwater management plans. Therefore, Alternative 2, without reservation, is the superior alternative.

In addition we have identified the following concerns which we understand other coalitions, such as the Southern San Joaquin Valley Water Quality Coalition (from which these comments are heavily based). These concerns are:

- **Groundwater is now included in the waiver and it presumes all irrigated lands drain to groundwater.** The document on pages 143, et seq. not only expands this surface water waiver to deal with the very complex area of groundwater, but wrongfully asserts that virtually all agricultural lands, including those that do not drain to surface waters of the state, shall be considered as discharging to groundwater. This is simply factually incorrect.
- **The lower San Joaquin Valley has far fewer water quality problems than that represented in the DPEIR.**
- **The timelines are unreasonably short.**
- **The Economic Analysis is inadequate overall and did not evaluate the staff preferred alternative.**
- **Baseline Conditions Are Misrepresented, So the Entire Environmental Analysis Is Tainted.** The DPEIR evidently relies on Alternative 1, the "No Program" Alternative, to represent the existing baseline conditions. However, the "No Program" Alternative misstates what will occur absent any Water Board action. Thus, the DPEIR lacks an accurate baseline against which to judge the environmental impacts of the proposed program.

In closing, Kings County Farm Bureau reiterates that Alternative #2 is the preferred program for the Central Valley Irrigated Lands Regulatory Program. As stated earlier, Alternative 2 is the best option to strengthen the existing surface water waiver.

Respectfully,

Frank Zonneveld
Director