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To: "AWLaputz@waterboards.ca.gov" <AWLaputz@waterboards.ca.gov>
Date: 6/5/2009 5:01 PM
Subject: Alternative SW 2

Adam,

These are my comments regarding the alternatives discussed during the ILRP Stakeholders Workshop meeting on May 18. I believe the Alternative SW 2 - Water Quality Management Measures can apply to most foothill areas within the region of the Central Valley Water Board including Nevada County. Many of the same conditions stated in the Low Threat Waiver proposal for irrigated agriculture in El Dorado County can be used as criteria for selecting geographical areas for this alternative. Here are some of the conditions described in the El Dorado proposal which can be used when selecting certain areas in the region for a Low Threat Waiver:

- > Geography - Commercial agricultural areas are interspersed with native riparian habitat,
- > Topography - Crops are more frequently planted on hillsides than on level land,
- > Pesticide Usage - There is low pesticide use per acre of cropland,
- > Irrigation practices - There are no surface irrigation systems, thus no tailwater,
- > Vineyards - There are no dormant sprays used in the vineyards; sulfur is the primary chemical sprayed in the summer months,
- > Dry farming - A significant portion of the county agricultural operations are practiced with little or no irrigation,
- > Water resources - Water supplies are very limited so significant water conservation programs are needed and are in place,
- > Erosion control - Due to the hilly terrain, most orchards and vineyards have cover crops to limit erosion during heavy winter rains,
- > Agricultural isolation - Agricultural areas are not contiguous as found in most valley locations,
- > Education and outreach - Conservation District, the Farm Advisor, and others are available to assist growers with the development of BMPs

Perhaps an elevation cut-off can be used. Some say the foothills for the purpose of this program should be 500 foot elevation. I think using the list above as a guide, other areas in the Water Board's region can be selected without focusing on elevation. The only line I would strike from Alternative SW 2 is the last one under Monitoring Provisions. "Individual growers will report compliance with the management objectives" should be removed from the language. The El Dorado County proposal states no physical sampling or monitoring. Because foothill agriculture creates very few impacts to surface and ground water quality, it should not be burdened financially for the management of a monitoring site.

Thanks for the opportunity to comment

Jeff Pylman