

**Board of Directors**

John Azevedo  
*President*  
David Reichmuth  
*Vice President*  
Alfred Scheuber  
Steve Prevostini  
David Fantozzi



John Sweigard  
*General Manager*

Toni Russell  
*Secretary/Treasurer*

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June 5, 2006

Rudy Schnagl  
Central Valley Regional Water Quality Control Board  
Sacramento Main Office  
11020 Sun Center Drive #200  
Rancho Cordova, CA 95670-6114

**Subject:      Opposition of Salinity Objectives Upstream of Vernalis**

Dear Mr. Schnagl,

As you know Patterson Irrigation District has publicly voiced its concerns with adopting salinity standards upstream of Vernalis on the basis of potential reduced return Ag drainage flows to the river and the lack of data and real world application of a salinity standard to protect the growing of beans.

Enclosed please find a board resolution opposing such standards and multiple grower affidavits supporting the position that setting a salinity standard for protection of the agricultural beneficial use of growing beans is not applicable on the ground or in the field.

Please feel free to call me with any questions or concerns.

Sincerely,

John Sweigard  
General Manager

Enclosures

Cc:      Pamela Creedon, Executive Director, CVRWQCB

## RESOLUTION 3 – 06

### PATTERSON IRRIGATION DISTRICT

#### RESOLUTION APPROVING POLICY OPPOSING THE ADOPTION OF SALINITY OBJECTIVES BETWEEN MENDOTA POOL AND VERNALIS BECAUSE OF WATER-LEVEL CONCERNS

##### WHEREAS:

1. The Patterson Irrigation District is an irrigation district duly organized and formed pursuant to, and in accordance with, the Irrigation District Law, Water Code Section 20500, et seq.
2. The salinity of the San Joaquin River and its impacts to agricultural and other beneficial uses is a matter of great importance to the Patterson Irrigation District.
3. The Central Valley Regional Water Quality Control Board is considering whether to adopt water quality objectives for salinity for the San Joaquin River from Mendota Pool downstream to Vernalis for the protection of agricultural beneficial uses.
4. The August 1987 State Water Board Order No. 85-1 Technical Committee Report titled *Regulation of Agricultural Drainage to the San Joaquin River* presented an evaluation of water quality issues specific to the Lower San Joaquin River (LSJR), recommended, for the full protection of all crops on all soil types in the Lower San Joaquin River Basin where adequate drainage is provided, a criterion of 700 uS/cm to fully protect irrigated agriculture, and indicated that salinity at or below this level should protect other beneficial uses, such as stock watering, fish, and wildlife.
5. The Patterson Irrigation District diverts water from the San Joaquin River, at a point of diversion between Mendota Pool and Vernalis, pursuant to both pre-1914 right and a permit issued by the State Water Resources Control Board.
6. The Patterson Irrigation District diverts water from the Delta Mendota Canal pursuant to United States Bureau of Reclamation Contract No. 14-06-200-3598A-LTR1.
7. The Patterson Irrigation District understands the importance of obtaining and maintaining adequate quality water and therefore uses a Supervisory Control and Data Acquisition System for its irrigation supply system to provide real time monitoring of various water quality parameters of its irrigation supply from the San Joaquin River, including salinity.
8. The Patterson Irrigation District irrigates approximately 13,530 acres, and its farmers cultivate and grow a variety of crops, including beans, corn, and alfalfa.
9. The farmers in the Patterson Irrigation District rely on both high-quality water as well as sufficient water levels in the San Joaquin River in order to protect their crop production and to determine which crops they choose to cultivate or grow.

**THEREFORE, BE IT RESOLVED THAT:**

1. The Patterson Irrigation District is committed to maintaining and protecting the quality of water in the San Joaquin River and to working with federal, state, and local agencies and non-governmental organizations to achieve such ends.

2. The salinity of the water diverted by the Patterson Irrigation District from the San Joaquin River has historically been sufficient to irrigate crops within the District's service area without adverse consequences.

3. The salinity of the water diverted by the Patterson Irrigation District from the San Joaquin River does not currently influence, or otherwise determine, which crops its farmers choose to cultivate or grow.

4. If water quality objectives for salinity were adopted for the San Joaquin River between Mendota Pool and Vernalis, an objective of 700 uS/cm, as recommended in State Water Board Order No. 85-1 Technical Committee Report, *Regulation of Agricultural Drainage to the San Joaquin River*, it may adversely impact the quantity of water in the river available for diversion.

5. For these reasons, the Patterson Irrigation District does not believe that a total maximum daily load for salinity should be adopted nor implemented for the San Joaquin River between Mendota Pool and Vernalis.

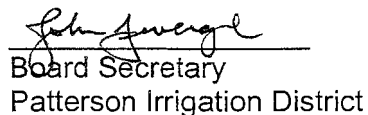
**PASSED AND ADOPTED** this 24th day of May, 2006, by the following vote:

Ayes: Azevedo, Reichmuth, Scheuber, Prevostini, Scheuber

Noes: N/A

Absent: N/A

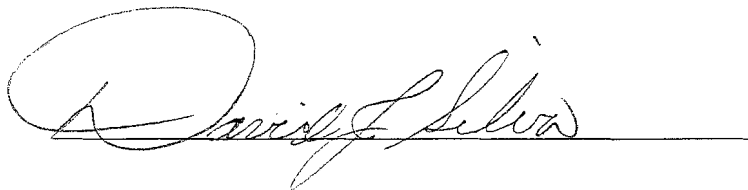
  
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President  
Patterson Irrigation District

  
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Board Secretary  
Patterson Irrigation District

I, David Silva, declare:

1. I am the owner and operator of David Silva Farms located at 12900 Elm Ave. in the Patterson Irrigation District.
2. I have grown large lima bush beans and baby lima beans for over 32 years.
3. My yields have generally been in the range of 3000 lbs/ac. for large lima bush beans and 3000 lbs/ac. baby limas.
4. I irrigate with water from the Delta Mendota Canal and San Joaquin River.
5. In the time I grew beans, concern about salinity in the irrigation water I apply did not influence the decisions I made regarding which crops I grew as owner of David Silva Farms.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and that this declaration was executed at Patterson, California on May 26, 2006.



A handwritten signature in cursive script, reading "David Silva", is written over a horizontal line. The signature is fluid and includes a large, circular flourish at the beginning.

I, David Reichmuth, declare:

1. I am a current member of the Board of Directors of the Patterson Irrigation District.
2. I am the partner and operator of Reichmuth Orchards located at 2118 Walnut Ave. in the Patterson Irrigation District.
3. I have grown large lima bush beans and green baby lima beans for over 25 years.
4. My yields have generally been in the range of 3000 lbs/ac. for large lima bush beans and 3000 lbs/ac. green baby limas.
5. I irrigate with water from the Delta Mendota Canal and San Joaquin River.
6. In the time I grew beans, concern about salinity in the irrigation water I apply did not influence the decisions I made regarding which crops I grew as a partner of Reichmuth Orchards.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and that this declaration was executed at Patterson, California on May 26, 2006.

  
David Reichmuth

I, Patrick Alves, declare:

1. I am the partner and operator of Alves Farms located at 755 Eucalyptus Ave. in the Patterson Irrigation District.
2. I have grown large lima bush beans and green baby lima beans for over 27 years.
3. My yields have generally been in the range of 2400 lbs/ac. for large lima bush beans and 3600 lbs/ac. green baby limas.
4. I irrigate with water from the Delta Mendota Canal and San Joaquin River.
5. In the time I grew beans, concern about salinity in the irrigation water I apply did not influence the decisions I made regarding which crops I grew as a partner of Alves Farms.

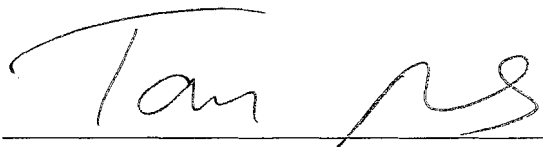
I declare under penalty of perjury under the laws of the State of California that the foregoing is true and that this declaration was executed at Patterson, California on May 26, 2006.

Patrick Alves

I, Tom Nunes, declare:

1. I am a partner and operator of "T" and "T" Farms located at 2513 Pear Ave. in the Patterson Irrigation District.
2. I have grown large lima bush beans and green baby lima beans for over 25 years.
3. My yields have generally been in the range of 2700 lbs/ac. for large lima bush beans and 2700 lbs/ac. green baby limas.
4. I irrigate with water from the Delta Mendota Canal and San Joaquin River.
5. In the time I grew beans, concern about salinity in the irrigation water I apply did not influence the decisions I made regarding which crops I grew as a partner in "T" and "T" Farms.

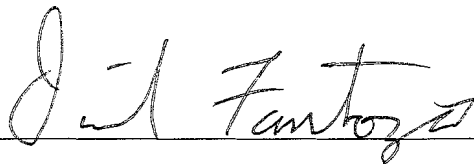
I declare under penalty of perjury under the laws of the State of California that the foregoing is true and that this declaration was executed at Patterson, California on May 26, 2006.

  
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I, David Fantozzi, declare:

1. I am a current member of the Board of Directors of the Patterson Irrigation District.
2. I am the owner and operator of David Fantozzi Farms located at 425 Fig Ave. in the Patterson Irrigation District.
3. I have grown large lima bush beans and green baby lima beans for over 20 years.
4. My yields have generally been in the range of 2500 lbs/ac. for large lima bush beans and 2500 lbs/ac. green baby limas.
5. I irrigate with water from the Delta Mendota Canal and San Joaquin River.
6. In the time I grew beans, concern about salinity in the irrigation water I apply did not influence the decisions I made regarding which crops I grew as the owner of David Fantozzi Farms.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and that this declaration was executed at Patterson, California on May 26, 2006.

  
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I, Steve Trinta, declare:

1. I am a former 13 year member of the Board of Directors of the Patterson Irrigation District, from 1990-2003.
2. I was a partner and operator of Trinta Bros.,Inc. for 20 years located at 524 Pomelo Ave. in the Patterson Irrigation District.
3. I have grown large lima bush beans and green baby lima beans for over 23 years.
4. My yields have generally been in the range of 2700 lbs/ac. for large lima bush beans and 3500 lbs/ac. green baby limas.
5. I irrigate with water from the Delta Mendota Canal and San Joaquin River.
6. In the time I grew beans, concern about salinity in the irrigation water I apply did not influence the decisions I made regarding which crops I grew as partner of Trinta Bros.,Inc.

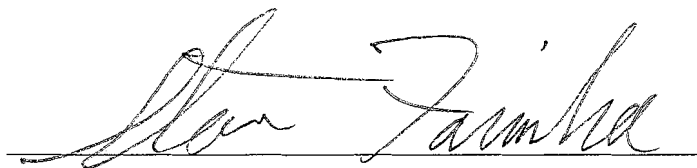
I declare under penalty of perjury under the laws of the State of California that the foregoing is true and that this declaration was executed at Patterson, California on May 26, 2006.

  
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I, Steve Farinha, declare:

1. I am a partner and operator of Farinha Farms located at 113 Almond Ave. in the Patterson Irrigation District.
2. I have grown large lima bush beans and baby lima beans for over 25 years.
3. My yields have generally been in the range of 2000 lbs/ac. for large lima bush beans and 2400 lbs/ac. baby limas.
4. I irrigate with water from the Delta Mendota Canal and San Joaquin River.
5. In the time I grew beans, concern about salinity in the irrigation water I apply did not influence the decisions I made regarding which crops I grew as a partner in Farinha Farms.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and that this declaration was executed at Patterson, California on May 26, 2006.

A handwritten signature in cursive script that reads "Steve Farinha". The signature is written in black ink and is positioned above a horizontal line.