



EL DORADO AGRICULTURAL WATER QUALITY MANAGEMENT CORP

PROTECTING OUR PRECIOUS RESOURCE

(1/23/18) Board Meeting
A-2239(a)-(c)
Deadline: 12/22/17 by 12 noon

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Placerville, CA 95667

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Felicia Marcus, Chair
State Water Resources Control Board
1001 "I" Street
Sacramento, CA 95812-0100
RE: "Comments to A-2239(s)-(c)." Second Staff Proposed Order Revising the Eastern San Joaquin General Order RS-2012-0116



Dear Chair Marcus

There are nine Regional Water Quality Control Boards, in the State of California, identified by watersheds, seasonal climates and other variations such as soil types and irrigation water supplies.

Previous administrators at the State Water Resource Control Board found it unreasonable to have one order fit all the conditions within the California ecosystem and we find this unreasonable as well. To assume that all commodities are grown under the same management practices is neither rational nor based in scientific evidence. Agriculture is extremely diverse in California, and to treat each grower and region the same is absurd.

Our group, the El Dorado Agricultural Water Quality Management Corporation has been designated as a low vulnerability group within the 2014 order. We have 300 growers farming 3,000 acres of noncontiguous parcels in the foothills and Sierra Nevada's, in an area of 1,786 square miles. We do not have groundwater aquifers like in the valley. There are no technical data to suggest there is filtration of nitrates into ground water*. There is also years of water testing and scientific data on file showing that water quality has not been compromised by Agriculture in the county.

The reporting requirements are onerous and burdensome. This sub coalition averages ten acres per member and most of the members have full time jobs doing something else. If growers must follow the changes to our order you suggest, they will actually be paying consultants through our third-party liaison, NCWA, to compile data. This added burden of paperwork is unnecessary as there are years of monitoring experience to show that there is clean water and agriculture has not damaged it in this foothill watershed. There are 2337 acres of wine grapes grown in El Dorado County. Growers do not use nitrogen on grapes in El Dorado County except in rare circumstances and the majority of the membership (67%+) represents wine grape growers.

We request that the Board reexamine its plan to treat every grower in every part of California the same. If the Board remains adamant that there be no exceptions in reporting for those now considered low vulnerability, the Board should seriously consider a separate order for the Valley floor and for the Foothills. They are too dissimilar to be in one order without low vulnerability designations.

*Coon Hollow Investigation – Final Report, Daniel J. Hinrichs, submitted To Sac Valley Regional Board December, 2008

Board of Directors

El Dorado Agricultural Water Quality Management Corporation

Dedrian Kobervig

President