



December 21, 2017

Ms. Jeanie Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor (95814)
P.O. Box 100
Sacramento, CA 95812-0100



Subject: A-2239(a)-(c)

Dear Clerk to the Board Townsend,

Thank you for this opportunity to comment on the State Water Resources Control Board (State Water Board) review of the Waste Discharge Requirements General Order No. R5-2012-0116 issued by the Central Valley Regional Water Quality Control Board. The San Diego Regional Irrigated Lands Group (SDRILG) serves as a third-party coalition assisting agricultural operators with compliance for the General Waste Discharge Requirements (San Diego GWDR) for agricultural operations in the San Diego Region.

SDRILG is submitting these comments out of concern that the actions taken by the State Water Board in regards to the Waste Discharge Requirements for Growers Within the Eastern San Joaquin River Watershed will be declared to be precedential. We believe the conditions that exist within the jurisdiction of the San Diego Regional Water Quality Control Board (San Diego Water Board) are vastly different and there is no cause to burden San Diego area producers with the requirement to create and submit certified nitrogen management plans.

There are a number of local characteristics that illustrate why an order for another region in the state regarding drinking water safety would not be applicable in San Diego.

- Of the 2,896,000 acres within San Diego County, only about two percent, or 60,000 acres, are in irrigated agriculture.
- Because of the topography, a lack of alluvial deposits, and limited rainfall, 97 percent of the domestic water supply serving the 3.2 million residents of San Diego County comes from importation, surface water, and desalination. Not groundwater. The majority of the 3 percent groundwater is used for agricultural irrigation.
- Virtually every residence in the San Diego Region is connected to the municipal water supply.
- Surface water collection occurs upstream from irrigated farm areas.
- The mean size of a farm in San Diego County is just four acres.
- With the price of water reaching \$2000 per acre-foot, San Diego County farmers have invested heavily in irrigation technology and employ extreme means of conservation.
- Agricultural water use in San Diego County has dropped 50 percent since 2007.

- In addition to extensive surface water testing, the San Diego GWDR calls for the testing of drinking water wells on farms.

Any one of the above conditions should be sufficient evidence that statewide water quality regulations on nitrogen, with the intent of protecting domestic water supplies, is not applicable in the San Diego Region. To have success with our irrigated lands program and get buy-in from growers the regulations must be appropriate for the region. If not, the regulations will lack credibility and be seen as punitive. If that becomes the case, erosion of confidence in the State Water Board, the San Diego Water Board, and the irrigated lands program should be expected.

As the members of the State Water Resources Control Board deliberate on the Waste Discharge Requirements for Growers Within the Eastern San Joaquin River Watershed, it is our sincere hope they will not issue a precedential order in the name of protecting domestic water supplies in areas where grower compliance would be a pointless exercise. The San Diego Region Irrigated Lands Group is prepared to assist growers in the application of best management practices, record keeping, runoff monitoring, and ongoing education to make certain that regional waters are protected. If that work is burdened with irrelevant tasks and costs, our success will be threatened.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Larson". The signature is fluid and cursive, with a large initial "E" and "L".

Eric Larson
Administrator