

**Dixon Resource
Conservation District**

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

1170 N. Lincoln Street, Suite 110, Dixon, CA 95620
Phone (707) 678-1655



December 22, 2017

Felicia Marcus, Chair
State Water Resources Control Board
1001 "I" Street
Sacramento, California 95812-0100

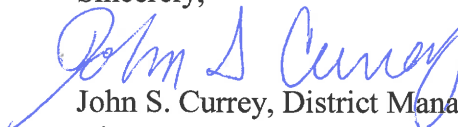
**RE: "Comments to A -2239(a) -(c)." Second Staff Proposed Order Revising the
Eastern San Joaquin General Order R5-2012-0116**

Dear Chair Marcus:

The Dixon/Solano Resource Conservation District Water Quality Coalition (Coalition) has administered the Irrigated Lands Program in eastern Solano County since 2004. We have roughly 130,000 irrigated acres enrolled and more than 600 memberships. The Coalition has successfully completed five surface water management plans for specific water quality issues since 2005. In addition, Coalition staff, landowners and growers have spent countless hours over the last four years assisting members comply with new individual reporting requirements and conducting intensive education and outreach around specific surface and groundwater quality issues.

While we understand the intent of the State Board to have comparable, consistent requirements between irrigated lands programs around the State, we have several concerns with the precedential nature of the proposed changes to the Eastern San Joaquin Order and its failure to recognize regional, crop and farm specific differences in California agriculture and in groundwater quality conditions. Reverting to a "one size fits all" approach would ignore the significant work with our Regional Board to make the current requirements more meaningful. This has included a focus in areas where we can achieve the most meaningful water quality benefits and adjustment of field level reporting requirements that account for differences between specific crops and local conditions. Maintaining flexibility in regulatory requirements is essential, both as a way to focus limited resources and to maintain the trust and credibility of our members.

Sincerely,


John S. Currey, District Manager
Dixon Resource Conservation District


Chris Rose, Executive Director
Solano Resource Conservation District