

Colusa Glenn

Subwatershed Program

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December 22, 2017

Felicia Marcus, Chair
State Water Resources Control Board
1001 "P" 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:

On behalf of the 1,717 members of the Colusa Glenn Subwatershed Program, which is the local implementation organization in Colusa and Glenn Counties for the Sacramento Valley Water Quality Coalition, I am writing to express our serious concerns regarding the proposed changes that are being considered to the Irrigated Lands Regulatory Program. The precedential direction by the State Water Resources Control Board that is in the Second Staff Proposed Order is a "one size fits all" approach that will result in an unnecessary and regressive burden upon agricultural operations in our area. This proposed precedential direction fails to recognize the numerous regional differences in both California agriculture and surface and groundwater quality conditions and will be counterproductive to the goals of achieving and maintaining the desired water quality objectives in Colusa and Glenn Counties and in the Sacramento Valley as a whole.

Surface water quality results in the Colusa Glenn Subwatershed Program area since 2005 have shown few exceedances of water quality objectives for registered pesticides and toxicity, and those problems identified have been addressed and solved by implementation and completion of Management Plans. Of the only three Management Plans triggered over our approximately 292,000 acres monitored, one of those Management Plans, for Chlorpyrifos and aquatic toxicity on Walker Creek in Glenn County, has received state and national attention as a success story and as a model for achieving results. This was achieved under the requirements of the current Order. Yet the Second Proposed Order is recommending the establishment of a Surface Water Expert Panel and a more expansive surface water monitoring program. The monitoring results in Colusa Glenn Subwatershed Program mirror the results as a whole for the Sacramento Valley: 98% of the surface water samples meet state water quality objectives. Adoption of an increased surface water monitoring program is unwarranted and unconnected to actual results, and will achieve no increase to the excellent surface water quality in the Sacramento Valley while inflicting a substantial financial cost to our members.

The imposition of new reporting requirements in Low Vulnerability areas, where 20+ years of groundwater monitoring by the United States Geological Service and other public agencies show no decline in water quality, will not yield meaningful results or provide any information that is not already available in the various technical studies. High resolution monitoring and the mass balance modeling recently completed in a long-term assessment of past and current potential loading to groundwater on irrigated and natural lands across the entire Central Valley of California by Dr. Thomas Harter, Chair of Water Management and Policy, UC Davis Department of Land, Air, and Water Resources refutes the need for new reporting requirements in Low Vulnerability areas.

The total population of Colusa and Glenn Counties is approximately 47,000. Yet, the direct cost in 2018 for compliance with the requirements of our current Order will be almost \$1,000,000. This is a significant financial burden since all of the communities in our area are classified as Disadvantaged Communities. Resources diverted into an increased surface water monitoring and increased reporting in Low Vulnerability areas will be borne by the citizens as a whole since this is monies not just spent locally for farm related payrolls and improvements but also not spent for extracurricular school programs such as FFA and 4-H, not for higher education, not for other school and community activities, and not for farm improvements to improve water quality. Let us spend our resources wisely.

As the State Water Board states on page 2 of the Proposed Order, a vast majority of landowners plan for the long term, and are “naturally motivated to protect natural resources, through the stewardship of the land.” This extends to water quality as well. The above mentioned “Walker Creek Success Story” is an excellent example of the advantages of education vs. regulation: we have the flexibility to proactively engage with our members to take actions that are beneficial to water quality, not to expend resources on reports that do not result in water quality improvements. I ask that the State Water Board not require the recommendation be precedential and to recognize the inherent advantages and efficiencies of allowing the current Order for the Sacramento Valley to remain in effect as is, so that we have the flexibility and ability to implement local solutions and continue our long history of stewardship based on our particular and unique circumstances. The current program is the better approach to protecting both surface water quality and groundwater quality in Colusa and Glenn Counties and the Sacramento Valley as a whole. The proposed changes will result in discouraging, not encouraging improvements in water quality.

Sincerely,



Larry Domenighini, President
Colusa Glenn Subwatershed Program

Cc: Bruce Houdesheldt
Sacramento Valley Water Quality Coalition
Northern California Water Association