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Via Email
(commentletters@waterboards.ca.gov)
Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
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RE: Comments to A-2239(a)-(c)

Dear Ms. Townsend:

In regards to Order R5-2015-0116-R3, growers regulated by the Central Valley Water Board's ILRP General Orders are required to participate in third-party outreach events at least annually if any of the Member parcels are in a designated high vulnerability area for surface water or groundwater, as mentioned in section IV. B.4. of the ILRP General Orders; yet if the goal of participating in these events is to inform of water quality problems and the management practices that are available to address those issues than attendance should be required by all concerning parties, including growers, their representatives and the regulatory agencies. Just because the parcel does not fall in a "high vulnerability" area does not mean that the management practices will not affect surrounding areas which could include "high vulnerability" spots. Continuing education on best management practices and keeping informed about water quality issues should be mandatory regardless of designation.

Due to the fact that there are a large portion of irrigated lands that are vulnerable to groundwater contamination from the agricultural use of certain pesticides, based upon either pesticide detections in groundwater or upon the presence of certain soil types by leaching and/or runoff, regulations should continue to require reporting of irrigation and nitrogen management data on a field-by-field basis. Requiring the amount of nitrogen applied and removed from the field would be more effective than relying on the management practices based on the A/R ratio. The A/R ratio is beneficial to give an indication of nitrogen use for future years but should not be an alternative to monitoring the amount of nitrate that is leaching. Management practices change as crop yields change, making it extremely difficult to rely on the annual A/R data to calculate a multiyear average. It still should be mandatory to track the exact nitrogen inputs and outputs, in addition to submitting the A/R ratio reports to the Central Valley Water Board. Every effort should be made to monitor the amount of nitrate that is leached to groundwater under each field.

These requirements should be implemented despite any increase in cost or capacity issues, in order to properly regulate water management practices. Please consider these comments when revising the Eastern San Joaquin River Watershed Agricultural Order SWRCB/OCC FILES A-2239(a)-(c).

Sincerely,

Danielle N Runion

Danielle N. Runion
OSU Graduate Student