

# COUNTY OF EL DORADO

330 Fair Lane  
Placerville, CA 95667  
(530) 621-5390  
(530) 622-3645 Fax

SUZANNE ALLEN DE SANCHEZ  
Clerk of the Board



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September 21, 2010

ILRP Comments  
Ms. Megan Smith  
630 K Street, Suite 400  
Sacramento, CA 95814

RE: Comments on the Draft Program Environmental Impact Report for a Waste Discharge Program for Irrigated Lands within the Central Valley Region

Dear Ms. Smith:

Per the Notice of Availability regarding the opportunity to provide comments on the Draft Program Environment Impact Report (PEIR) for a Waste Discharge Regulatory Program for irrigated lands within the Central Valley Region the following comments are being submitted for review and consideration. The draft PEIR analyzes the environmental impacts of five program alternatives plus a proposed staff recommendation for a long term plan to best meet the applicable statutory requirements and the goals and objectives of the Irrigated Land Regulatory Program (ILRP). Each alternative has their individual merits, but the alternatives are not flexible enough for the non water basin areas of the central valley such as El Dorado County.

Based on the Department of Water Resources Bulletin 118 California Groundwater Basins and Sub-basins Map El Dorado County west of the Sierra Nevada crest does not contain a groundwater basin or sub-basin. Therefore, it would seem appropriate that this area is covered under Water Code Division 6, Chapter 1, Part 2.11, Section 10921 which precludes El Dorado County from conducting groundwater monitoring and irrigated landowners will continue to use established management practices.

A large portion of the County of El Dorado is located on the Western Sierra Nevada Mountains where irrigated lands are limited to 10 or 20 acre parcels with generally poor to rocky soil conditions. Groundwater in these areas generally is deep, over 200 feet, with low productivity and used for domestic and/or small farming activities. In Table 5.9 of the PEIR the County of El Dorado is not recognized as having any pesticides detected in wells from 1985-2003.

In lieu of a single alternative for regulating waste discharges from irrigated agricultural lands, we respectfully suggest a tiered approach similar to other State Water Board Regulations with the least regulated tier applying to those agriculture lands that are not in a recognized water basin or sub-basin. In conjunction with this tiered methodology an approved management practice program would be required and existing groundwater data will be reviewed and assessed to determine whether the objectives of the regulatory programs are being achieved.

Based on the information provided, it appears that the County of El Dorado County irrigated lands should not be required to conduct groundwater monitoring and placed in a least regulated tier as identified above. It is the intent of the County to work with the El Dorado County Agricultural Water Quality Management Corporation and the El Dorado County Water Agency in the development of a compliance work plan. We support the El Dorado County Agricultural Water Quality Management Corporation irrigated land coalition in their action to comply with the Pilot Watershed Management Practices Plan and support their desire to achieve a reasonable and logical management practices plan for the irrigated lands of the County of El Dorado.

Thank you for your time and consideration of the County of El Dorado's position regarding the Draft Program Environmental Impact Report for a Waste Discharge Program for Irrigated Lands within the Central Valley Region.

Sincerely,

A handwritten signature in cursive script that reads "Norma Santiago".

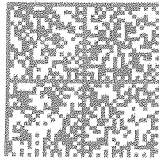
Norma Santiago, Chair  
County of El Dorado Board of Supervisors

Cc: El Dorado County Water Agency  
El Dorado County Agricultural Water Quality Management Corporation

**County of El Dorado**  
**Board of Supervisors**  
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Placerville, CA 95667-4197

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