

From: Glenn and Marie Nader
To: [commentletters](#)
Subject: Comments to A -2239(a) -(c)
Date: Wednesday, December 20, 2017 11:38:40 AM



December 20, 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:

I am writing to express my concern about the inconsistent and costly changes that the State Water Resources Control Board is considering to the irrigated lands program. The precedential direction by the Board is a one size fits all approach that is inconsistent with the concept of local water quality monitoring to identify specific parameters that exceed standards and addressing them. To put it bluntly, why are we monitoring if the data is not the driving factor in requirements? Why are we spending energy filling out paperwork in areas of low vulnerability that will not improve the environment or the viability of our agriculture operations? We are just generating paper reports that no one will ever read or be of value to our society.

Subjecting agriculture producers to further regulation requirements in areas that have no proven violation of standards will increase costs to producers without any demonstrated need. Our organic hay and cattle operation in Modoc County is quite different than the Eastern San Joaquin area. Your action fails to recognize the regional differences in California agriculture and groundwater quality conditions. We have tested our domestic well water in September and had no nitrogen levels detected. The majority of our pasture receives no nitrogen fertilizer. We have worked extensively with the USDA Natural Resources Conservation Service to address potential water quality issues on our ranch. We had a regional board staff member tour the ranch seventeen years ago and assist us in planning and funding water quality improvements. This is how we truly improve the environment through local on the ground cooperative planning, not through filling out paperwork (Irrigation and Nitrogen Management Plan and Management Practices Implementation Reports).

This action is also one of the cumulative impacts on agriculture land use that should require a CEQA Environmental Impact Review. That would allow for the detailed development of the cost of implementation, evaluation the impact of agricultural operations viability and resulting land use and wildlife habitat impacts.

This action also usurps Central Valley Board and their staff's ability to govern and to develop specific action based on monitoring data. It violates the concept of the reason for Regional Boards. They have staff and board members that understand the local watersheds and can take action that is in the best interest of the environment and local producers that make up that ecosystem.

I request that the State Board abandon this precedential order and stay consistent by allowing regional boards and their staff to continue implementation of existing monitoring plans to identify threats to water quality and developing local water quality orders. This will focus our collective energy solving problems on a local level, where real environmental action needs to be formed.

Sincerely,

Glenn Nader

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