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To: [commentletters](#)
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Subject: "Comments to A -2239(a) -(c)." Second Staff Proposed Order Revising the Eastern San Joaquin General Order R5-2012-0116
Date: Friday, December 22, 2017 11:14:39 AM

December 21, 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:

We are writing to express our concern about the changes you are considering to the irrigated lands program. The precedential direction by the State Water Resources Control Board fails to recognize the regional differences in California agriculture and groundwater quality conditions. The "one size fits all" approach that is in the Second Staff Proposed Order will result in disproportionate burden and cost to my agricultural operation.

In the Frequently Asked Questions (FAQ) the response to Question 5 – How does the Proposed Order differ from the draft order released in February 2016? -, **states the Proposed Order is intended "to minimize increased in the reporting burden for growers and the coalition."** However it does the exact opposite, by 1) requiring uniform reporting for landowners like us who don't apply nitrogen to our irrigated pasture operation, 2) requiring us to complete a new and expansive Irrigation and Nitrogen Management Plan (INMP), and 3) requiring us to complete a Management Practices Implementation Report (MPIR).

The Proposed Order acknowledges on Page 25, "the expanded reporting obligations will result in increased costs to the growers in low vulnerability areas." **This is a clear and wasteful step backward in the science based efforts of upper watersheds to encourage much needed regional and commodity specific modifications for low-threat agriculture like irrigated pasture in the upper watersheds.**

This proposed increase in cost should not be viewed in isolation. Agriculture must

pay numerous fees – water master, diversion measurement structure installation and reporting fees, rural fire tax, infrastructure permit fees, etc. **The cost benefit continues to decline with each new fee attached** to comparatively low margin, and only cropping option, such as irrigated pasture in the mountain watershed regions of the State.

Like all things in our agricultural operation, we conscientiously complete a Farm Evaluation and Nitrogen Management Plan (none applied) and the Sediment and Erosion Control Plan even though my agricultural operation overlies a basin that is shown **not** to be impacted by nitrogen. Furthermore, neither we nor most of our neighbors apply nitrogen in our low return native mountain pasture agricultural operations.

Rather than require the Sacramento Valley Water Quality Coalition, and specifically its foothill and mountain subwatersheds, to make a demonstration; please “allow a category of growers to be exempted from the nitrogen applied and removed reporting requirements “ (Page 26, Second Proposed Order). Why not use localized information about groundwater quality conditions similar to the approach being taken in the Sustainable Groundwater Management Act (SGMA).

Again, this and many of the new precedential requirements will not yield meaningful nor high quality data to help better protect groundwater quality and are a **burden without benefit** to protect surface or groundwater quality. **Local projects are far more effective in promoting ILRP goals** than channeling these same dollars into unrelated crop studies, redundant reporting mandates and obscure databases inaccessible by individual members.

When local dollars can remain within the subwatersheds to be utilized by irrigators for on-the-ground projects rather than misdirected to distant consultants and data base management firms in Sacramento, enhanced water quality is a real outcome.

In fact, the precedential recommendations in the Second Proposed Order will have unintended consequences and costs for the environment. Because of the added cost pressure on irrigated pasture, orchard grass and other low value commodities the result will be a loss of habitat for wildlife and waterfowl.

Groundwater quality in the Sacramento Valley’s upper watersheds and foothills has been documented in numerous technical studies to be excellent. These studies show that for decades to come the groundwater quality conditions will remain unimpaired.

Agriculture throughout the Sacramento Valley and the Central Valley has spent years taking actions to promote and implement the highest level of stewardship of our water resources for agriculture, the environment and drinking water.

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We urge you to take the time to fine tune this Order, by crafting and including low threat pasture & forage crop options as well as low vulnerability area options.

Sincerely,

*Jim & Carol Dobbas
Sattley, Sierra County
Upper Feather River Subwatershed Group*

*Cc: Vice-Chair Steven Moore
E. Joaquin Esquivel*

Tam M. Doduc

Dorene D'Adamo

Darrin Pohlemus

Emel Wadhwani

Dr. Karl Longely, Chair, Central Valley Regional Water Quality Control Board

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