

## Lake County Farm Bureau Education Corporation

Lake County Agricultural Lands Subwatershed Group  
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May 10, 2016

To:

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
PO Box 100  
Sacramento, CA 95812-0100



### Re: Comments to A-2239(a)-(c)

Dear Ms. Townsend,

On behalf of Lake County owners and operators of irrigated agriculture, the Lake County Farm Bureau Education Corporation (LCFBEC) strongly opposes the changes set forth in the East San Joaquin Waste Discharge Requirements. The LCFBEC is particularly opposed to the language which sets these changes as precedential for all areas of the state. Applying a 'one-size-fits-all' approach to the Irrigated Lands Regulatory Program fails to take into account the diverse nature of farming in California and is economically unfeasible in rural areas such as Lake County.

Lake County lies on the western border of Central Valley Regional Water Quality Control Board jurisdiction and falls into the Sacramento Valley Water Quality Coalition (SVWQC). Lake County is characterized by low-impact farming, a low population density and very good surface water quality results over the past 10 years. Agriculture comprises 1.2% of Lake County's total area with most farms at 30 acre or less. Over half of Lake County irrigated acres are winegrapes which use micro-irrigation systems and employ sophisticated management practices to protect against erosion and run-off. The Lake County Winegrape Commission's widely-used Sustainable Winegrowing Program and the robust Lake County Grading Ordinance set standards of best management practices across the county.

The Lake County Farm Bureau Education Corporation recognizes the importance of clean water and advocates for best management practices in agriculture to meet this objective. To this end, Lake County farmers have been successful by following the current Central Valley WDR and adhering to practices advised by the Winegrape Commission, NRCS and UCCE advisors. Lake County is currently in a low vulnerability classification due to excellent surface water quality results and groundwater far below the state's target levels for nitrate. The WDR changes propose to eliminate vulnerability distinctions which ignores the hundreds of thousands of dollars Coalition members invested on their Groundwater Assessment Report (GAR).

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Expanding certification and reporting requirements on all growers in all areas, requiring all management practice and nitrogen application information to be publically reported on a field level basis (with location information) and requiring sampling of all domestic wells and reporting results on a public website are all measures that will be a redundant financial burden on Lake County farmers with little added benefit to water quality.

Simply put, using regulations tailored to one of the more impacted areas of the state and applying them to Lake County is illogical. The continuing downward trend in water quality exceedances and completed management plans in the Sacramento Valley shows that the Central Valley's current WDR is effective. If our farming practices, water quality results and crop types do not resemble East San Joaquin or the Central Coast, why would water quality regulations specifically designed to mitigate problems in that area be applied here?

The Lake County Farm Bureau Education Corporation strongly urges the State Water Resources Control Board to reassess the precedential nature of the East San Joaquin Waste Discharge Requirements and consider that the current Central Valley WDR is adequate to protect against surface water quality degradation in the Sacramento Valley. Thank you for your time and consideration in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brenna Sullivan', with a long horizontal flourish extending to the right.

Brenna Sullivan  
Executive Director

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