

SAN DIEGO REGION

IRRIGATED LANDS GROUP

May 16, 2016

Ms. Jeanie Townsend
Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100



Regarding: Proposed Order Reviewing Central Valley Regional Water Quality Control Board
Order No. R5-2012-0116

Dear Clerk to the Board Townsend,

Thank you for this opportunity to comment on the above referenced order. Our irrigated lands group is not expert on the conditions that exist within the jurisdiction of the Central Valley Regional Water Quality Control Board. However, we are gravely concerned that actions taken by the State Water Resources Control Board in regards to the Waste Discharge Requirements for Growers within the Eastern San Joaquin River Watershed will be declared to be precedential. We believe the conditions that exist within the jurisdiction of the San Diego Regional Water Quality Control Board (Regional Board) are vastly different and there is no cause to burden San Diego area producers with the requirement to create and submit certified nitrogen management plans.

The San Diego Region Irrigated Lands Group (SDRILG) is a California non-profit organization that was formed in 2009 to give growers a path for compliance for the Regional Board's Agricultural Conditional Waiver (Waiver). SDRILG represents more than 1200 farm sites and the majority of irrigated acreage in the region. Soon the Regional Board will be adopting a General Waste Discharge Requirement (GWDR) for commercial growers and SDRILG will continue with its mission of providing grower compliance. The GWDR, as was the Waiver, will be a local regulation, developed locally for local conditions. That is how it should be.

It appears there is fundamental agreement on the topic of locally created regulation expressed on the State Water Resources Control Board's website where it states, "*There are nine Regional Water Quality Control Boards. The mission of the Regional Boards is to develop and enforce water quality objectives and implementation plans that will best protect the beneficial uses of the State's waters, recognizing local differences in climate, topography, geology and hydrology.*"

There are a number of local differences that illustrate why an order for another region in the state would not be applicable in San Diego.

- Of the 2,896,000 acres within San Diego County, only about two percent, or 60,000 acres, are in irrigated agriculture.
- Because of the topography, a lack of alluvial deposits, and limited rainfall, 97 percent of the domestic water supply serving 3.2 million residents in San Diego County comes from importation, surface water, and desalination, not groundwater.
- Surface water collection occurs upstream from the irrigated farm areas.
- The mean size of a farm in San Diego County is just four acres.
- With the price of water now in the range of \$1500 to \$1700 per acre-foot, San Diego County farmers have invested heavily in irrigation technology and employ extreme means of conservation.
- Agricultural water use in San Diego County has dropped 50 percent since 2007.

Any one of the above conditions should be sufficient evidence that statewide water quality regulations on nitrogen with the intent of protecting domestic water supplies has no applicability in San Diego. To have success with our irrigated lands program and get buy in from growers the regulations must be appropriate and defensible for the region. If not, the regulations will lack credibility and be seen as punitive.

As the members of the State Water Resources Control Board deliberate on the Waste Discharge Requirements for Growers within the Eastern San Joaquin River Watershed it is our sincere hope they will not issue a precedential order in the name of protecting domestic water supplies in areas where grower compliance would be a pointless exercise. The San Diego Region Irrigated Lands Group is prepared to assist growers in the application of best management practices, record keeping, runoff monitoring, and ongoing education to make certain that regional waters are protected. If that work is burdened with irrelevant tasks and costs, our success will be threatened.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Larson", written in a cursive style.

Eric Larson
Administrator