



NAPA COUNTY FARM BUREAU

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May 18, 2016

Ms. Jeanie Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
P.O. Box 100
Sacramento, CA 95812-0100
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RE: Comments to A-2239(a)-(c)

Dear Chair Marcus and Members of the Board:

On behalf of the 62 members of the Napa County Putah Creek Watershed Group (PCWG), we write to comment on the pending changes to the General Order of Waste Discharge Requirements for the Irrigated Lands Program for the East San Joaquin Valley, and to thank you for scheduling multiple workshops about this important water quality issue.

Knowing that the State Water Board believes these changes to be precedential, we implore you to reconsider the current alternatives and craft a revised order that achieves the goals of protecting water quality in areas with irrigated agricultural lands using a common sense approach and ***with recognition of the diverse regional watershed conditions throughout the state.***

Specifically, we urge you to:

1. Retain the distinction between high and low vulnerability areas.
2. Work with the California Department of Food and Agriculture, the Ag Expert Panel, UC Davis, Natural Resources Conservation Service and Resource Conservation District professionals to create more appropriate refinements to the Nitrogen Management Plans.
3. Keep the aggregate reporting format for the Third Party Farm Plan submissions and respect the privacy of the growers.
4. Eliminate the requirement to sample all domestic wells on lands covered by the ILP.
5. Recognize that groundwater quality issues differ throughout the state. Groundwater conditions and farming operations in Napa County and other Region 2 counties are very different than the East San Joaquin Valley region. Imposing a uniform set of reporting requirements will result in a costly and ineffective program.

For over 12 years, the PCWG growers have complied with the Water Board's directives, engaged in educational programs and outreach on Best Management Practices to protect the watershed, and conducted ongoing and periodical water quality monitoring to assess the impacts of our agricultural operations.

With excellent water quality results and a de minimis amount of farming in our vast watershed (just 1.7% or 3,900 acres of irrigated farming within a 231,000 acre watershed), we've implemented an innovative and

appropriate WDR Pilot Plan over the last 4 years and hope to continue that successful Pilot Program with the Reduced Monitoring and Management Plan option in the Sacramento Valley WDR.

Again, we want to stress the regional distinctions when crafting regulations to address water quality issues. Napa County implemented comprehensive Conservation Regulations in 2000 and has stringent environmental protections in place with erosion control plan requirements for agriculture and vegetative cover protections for domestic water supply watersheds. Napa growers utilize deficit and drip irrigation, have lower chemical usage than many other crops and participate in sustainable farming certification programs to proactively improve habitat and watershed conditions.

With successful public/private partnerships, we've engineered and implemented innovative river restoration projects to restore 12 miles of the main stem of the Napa River, reduce bank erosion, reduce sediment loading, restore habitat for salmonids and other aquatic species, restore a continuous corridor of riparian habitat for birds and wildlife, and replace invasive plants with native species.

Our grower members are excellent stewards of the land and committed to sustainable agriculture.

We respect the role of the Water Board in safeguarding the water quality of the state and we implore you to show mutual respect for the growers' commitment of time and money over these last 12 years of the ILP, and to revise the rules and appropriately. It is entirely possible for a revised WDR regulation to be effective in protecting and improving water quality and concurrently reduce the regulatory burden and unnecessary cost and complexity of the WDRs throughout the state.

We also offer to host you for farm tours in Napa, as we've done with the Central Valley Regional Water Quality Control Board staff.

Thank you for the opportunity to comment and for your careful consideration of our comments.

Respectfully submitted,



Sandra Elles
Putah Creek Watershed Group Coordinator &
Napa County Farm Bureau Executive Director

cc: Greg Clark, Napa County Agricultural Commissioner
Leigh Sharp, Napa County Resource Conservation District
Diane Dillon, Napa County Supervisor
Rita Steiner, USDA Natural Resources Conservation Service, Napa office
Bruce Houdesheldt, Sacramento Valley Coalition
Kari Fisher, CA Farm Bureau Federation Associate Counsel, Legal Division