

3.4.35 Letter 27—Josie Nieto

89-17-10 10:03 FROM-community water cent 5597338219 T-014 P005/005 F-217
Comment Letter IL27

Josie Nieto, Seville/contaminada
The town water is ~~contaminated~~
we pay \$60 a month but the
water can't be used for drinking
we has to buy gal water for
drinking and cooking. 27-1

We would they for you to
do your job protect our water

Josie Nieto
15666 Seville
Ave Seville

3.4.35.1 Responses to Letter 27

27-1

See Comment Letter 14, Response 1.

3.4.36 Letter 83—Linda Ormonde

Comment Letter IL83

Central Valley Regional Water Quality Control Board
 Long-term Irrigated Lands Regulatory Program
 Draft Programmatic Environmental Impact Report Public Comment Form

Name:	LINDA ORMONDE
Mailing Address:	P.O. Box 217 HOLT, CA 95234
Telephone No. (optional):	
Email (optional):	lmo243@att.net

Comments/Issues:	Sept 23, 2010 The cost factor of implementing any of the alternatives is underestimated. The cost that are indirect to the producers are not taken into the calculations. The cost of keeping up with the regulations increase through more cost to individual producers for getting needed information, hiring professional advisors. To water districts, Reclamation districts and coalitions having to charge more to producers to pass the cost on to producers. In the past five years the increase in these cost is due directly to more regulations and will continue to increase in the future. This will drive producers out of business. <i>Linda Ormonde</i>
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Please use additional sheets if necessary.

SUBMIT WRITTEN COMMENTS BY SEPTEMBER 27TH TO:

Mail: ILRP Comments
Ms. Megan Smith
630 K Street, Suite 400
Sacramento, CA 95814

Email: ILRPcomments@icfi.com

Website: http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_land/long_term_program_development/

83-1

3.4.36.1 Responses to Letter 83

83-1

See Master Response 17. The costs for planning, monitoring, education, and reporting requirements were considered for each alternative.

3.4.37 Letter 21—Ana Karen Orozco

Comment Letter IL21

Central Valley Regional Water Quality Control Board
 Long-term Irrigated Lands Regulatory Program
 Draft Programmatic Environmental Impact Report Public Comment Form

Name:	Ana Karen Orozco
Mailing Address:	anna-y-oscar@hotmail.com 41726 Fruitvale Ave. E. Orozco CA 93647
Telephone No. (optional):	(559) 528-0711
Email (optional):	anna-y-oscar@hotmail.com

Comments/Issues:

My name is Ana Karen Orozco. I live in E. Orozco CA. I part of youth-4-HEALTH In my community I cant drink the water the reason why is because it has high level of nitrates. This is true for many other community in the valley. My parents have to buy pay \$57.00 for water a month & they also have to ~~buy~~ drinking water (bottle water) for making food & us to drink. So I would like the water board to do its job right & help us clean are water because WE ARE the future in E. Orozco. I I dont believe its right for us to have to buy water for us to drink & pay for water bill.

21-1

Please use additional sheets if necessary.

SUBMIT WRITTEN COMMENTS BY SEPTEMBER 27TH TO:

Mail: ILRP Comments
 Ms. Megan Smith
 630 K Street, Suite 400
 Sacramento, CA 95814

Email: ILRPcomments@icfi.com

Website: http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/long_term_program_development/

3.4.37.1 Responses to Letter 21

21-1

See Comment Letter 14, Response 1.

3.4.38 Letter 28—Maria Elena Orozco

Comment Letter IL28	
Ms. Elena Orozco fruitvale ave Coalicion Agua. E. Orozco California	
1. problema - Nitratos - se nitratos,	28-1
2 Ser mas responsables para cuidar la agua	
3 problema - nitratos,	
4 Recomendacion - Pedido, Queremos que nos agan caso soy de E. Orozco	
5 telefono y domicilio. 559) 528-0711	

IL28

Ma. Elena Adela Orozco
A.G.U.A. Coalition
Fruitvale Ave.
E. Oroshi, CA

1. Problem – Nitrates – 52 nitrates
2. Be more responsible for taking care of the water
3. Problem – nitrates
4. Recommendation – Request
We want you to pay attention to us. I am from E. Oroshi.
5. Telephone and address
559-528-0711

María Elena Orozco
41728 Fruitvale Ave.
Oroshi, CA 93647

3.4.38.1 Responses to Letter 28

28-1

See Comment Letter 14, Response 1.

3.4.39 Letter 8—Jesus Quevedo

Comment Letter IL8

Dirección Regional de Control de Calidad de Aguas de Central Valley
 Programa Regulatorio a Largo Plazo de Tierras de Regadío
 Formulario de Comentarios Públicos Anteproyecto Programático de Impacto Ambiental

Nombre:	JESUS Quevedo
Domicilio:	12610 Rail Road DR Cutler ca 93635
No. Teléfono (optativo):	559-528-6505
Email (optativo):	

Comentarios/Problemas:

agua contaminada a
 600 Pies de Profundidad
 las escuelas no tienen agua
 limpia por tiempos

 que se examinen Regulaciones
 mas estrictas para detener la
 epidemia de enfermedades
 por causa de los pesticidas
 y Fertilizantes

 que la mesa Regional
 aga su Trabajo mas
 efectivo

 muchas gracias por material en
 español y la traducción

8-1

Por favor utilize páginas extras si es necesario.

PRESENTE COMENTARIOS POR ESCRITO EN O ANTES DEL 27 DE SEPTIEMBRE A:

Dirección: ILRP Comments
 Ms. Megan Smith
 630 K Street, Suite 400
 Sacramento, CA 95814
Email: ILRPcomments@icfi.com
Página Web: http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/long_term_program_development/

IL8

Jesús Quevedo
12610 Rail Road Dr.
Cutler, CA 93615

559-528-6505

Water contaminated to 600 feet deep. The schools do not have clean water to drink.

[illegible] more effective regulations to stop the wave of diseases due to pesticides and fertilizers.

The Regional Board should do its work more effectively.

Thank you very much for material in Spanish and the translation.

3.4.39.1 Responses to Letter 8

8-1

See Comment Letter 14, Response 1.

3.4.40 Letter 26—Jesus Quevedo

09-17-10 10:05 PM CVRW-Community water cent 559/338219 T-014 P004/005 P-217

8-8-2010
Comment Letter IL26

rababula

Jesus Quevedo
Comunidad Cutler Asoci. East Oraci

agua contaminada hasta 600
Pies de profundidad

que se exceden reglas
efectivas y con tanta flexibilidad
mes Regional que cumplan con su trabajo

gracias Phone 528-6505
Rail Road Tr Cutler 93615

26-1

IL26

8/8/2010

Jesús Quevedo
Cutler Community
Orosi East Orosi

Problem: Water contaminated to 600 feet deep

Recommendation: [illegible] effective regulations with enough flexibility
Regional board should do its work

Thank you.
Phone 528-6505
Rail Road Dr.
Cutler 93615

To: Ms. Megan Smith
Fax: 916-456-6724
From: Maria Herrera
Date: 9/17/10
Pages: 5
Re: ILRP Comments

3.4.40.1 Responses to Letter 26

26-1

See Comment Letter 14, Response 1.

3.4.41 Letter 40—Rebecca Quintana, Board Member, Stone Corral School District

Comment Letter IL40

Rebecca Quintana
15524 Ave. 381
Visalia, CA 93292
(559) 736-2869

September 17, 2010

Re: ILRP Comments

Dear Ms. Smith,

As board member of the Stone Corral School District in Seville and valley resident, I am writing to ask the Regional Water Board to develop an Irrigated Lands Regulatory Program that is strong enough to reduce fertilizer and pesticide pollution of our valley's water resources before any more schools and communities lose their source of safe drinking water.

Students at Stone Corral School are unable to drink the water from the fountains because it has high levels of nitrates. As a result, our school is forced to spend anywhere from \$400-\$600 a month on bottled water. Additionally, when our students go home they are also faced with the same reality. Seville families are also forced to seek alternative water sources. This is in addition to our \$60 a month water bill. We are a small unincorporated community and many of our residents are farmer workers. Our residents and schools cannot afford the cost of contamination. However, Seville and Stone Corral School are not alone, many other valley schools and communities are also facing this problem.

40-1

The Board has the job to protect our drinking water sources from all sources of contamination including irrigated ag. I understand that it is hard to stand up against pressure from agricultural interests here in the Valley. But we are counting on the board to do its job, and make sure this program is effective so that our children will still be able to find water that is safe to drink.

The board needs to develop a program that includes: (1) a way to collect basic information from farms, such as how much fertilizer is being applied and how much nitrate is already in Valley water supplies; (2) individual farm plans for extremely high risk areas that include clear guidance for farmers on what practices are necessary to protect water from contamination; and (3) adequate enforcement mechanisms so that this program results in meaningful, widespread changes.

40-2

Sincerely,



Rebecca Quintana

3.4.41.1 Responses to Letter 40

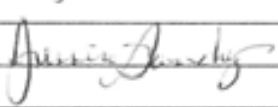
40-1

See Comment Letter 14, Response 1.

40-2

The recommendations in this comment have been considered and evaluated in the Draft PEIR, the Draft PEIR, Appendix A, and the Draft ILRP Economics Report. Requirements for fertilizer tracking, monitoring of existing wells, and individual farm water quality plans are contained in the range of alternatives considered. ILRP requirements will be implemented through waivers and WDRs. The requirements of waivers and WDRs are fully enforceable under the California Water Code.

3.4.42 Letter 38—Jessica Sanchez, Agua Youth Representative

Central Valley Regional Water Quality Control Board Long-term Irrigated Lands Regulatory Program Draft Programmatic Environmental Impact Report Public Comment Form		Comment Letter IL38
Name:	Agua Youth Representative (Jessica Sanchez)	
Mailing Address:	13922 Florida Ave E. Orosi, Ca 93647	
Telephone No. (optional):	(559) 528-6407	
Email (optional):	Jay 6409@gmail.com	
Comments/Issues:		
Hello, my name is Jessica Sanchez. I'm part of Youth For A.G.U.A. as for all the problems I have in mind there is only one that really stresses me out day and night is the water problem. In my community the water is contaminated with Nitrates. It upsets me a lot because no one realizes how bad this problem is, people can die from drinking this water. Not only they get affected but also unborn children, because they don't get a chance to live one day. Just because the water is contaminated we try to provide awareness in our group but its hard to be everywhere at one time just giving a little of our time to be telling people that they can't drink their tap water. This is why it angers me that nobody does anything to try to fix it. So please, I beg you change this for the future generation to come.		
Thank You, 		
Please use additional sheets if necessary.		
SUBMIT WRITTEN COMMENTS BY SEPTEMBER 27TH TO:		
Mail:	ILRP Comments Ms. Megan Smith 630 K Street, Suite 400 Sacramento, CA 95814	
Email:	ILRPcomments@icfi.com	
Website:	http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/long_term_program_development/	

38-1

3.4.42.1 Responses to Letter 38

38-1

See Comment Letter 14, Response 1.

3.4.43 Letter 114—Ryan Schohr

Comment Letter IL114

Ms. Smith,

I am 5th Generation California farmer, and wanted to make a few comments on the Irrigated Lands Regulatory Program (ILPR) Environmental Impact Report (EIR). Below, I will address several areas of concerns. My comments will address what's found in the entire document, and should not be misrepresented as being only relevant to any one of the 5 "alternatives," but rather addressing what's been presented through the EIR as a whole.

- I. Staff remarked at the September 10th workshop in Chico, California that in preparing the economic impact of the alternatives, data pertaining to the economic productivity (production value in US Dollars) of specific crops grown in the region, were nearly a decade old in some cases. This brings up the following questions:
 - A. More current (less than two years old) and, subsequently more accurate, production values should have been used in the economic forecasting, and therefore represented in the economic impact analysis of the alternatives.
 1. Current economic production data for crops grown in the region are prepared annually, as mandated, by California's County Agricultural Commissioners and provided publicly. This information should have been included to reflect current crop patterns and market conditions. In some cases, the production value of certain crops grown in the region has increased substantially, while others have declined. The information is readily available, and should have been used when presenting data to the board, and the public, when addressing the production value of crops going forward.
 - i. *Why was more current and accurate data from County Agricultural Commissioners, or the United States Department of Agriculture's various entities, not used the preparation of the documents?*
- II. Staff also remarked at the September 10th workshop in Chico, California, that forecasts (from the model used to predict the economic impact) indicated a trend away from the production of lower value crops like grain, and towards increasing production of high-value crops in the wake of the additional burden placed on landowners and farmers from this regulation. However, it was also mentioned that the model **did not** include what would happen to the value of production should this supposed shift in crops change supply and demand (crop pricing conditions) conditions following the shift in crops. This information should be included. Evidently, according to staff, the model also **did not** account for the suitability of a shift in cropping patterns of specific areas in the region.
 - B. A shift of cropping patterns towards what are purported to be higher value crops in the EIR will cause a change in the particular commodity's supply and demand, therefore negatively impacting (through the commodity price) the perceived "higher value" after the shift occurs.

114-1

114-2

114-3

<p>1. If farmers and landowners shifted production away from crops such as grains like oats, wheat, or rice, towards orchard crops such as almonds, peaches, or walnuts, as the staff predicts, there would be a greater supply of orchard crops. For centuries, economists have known that a greater supply leads to reduced prices.</p> <p><i>i. Why did the model and subsequent economic impacts consider a change in cropping patterns, yet chose to ignore the result of the shift by accounting for the greater supply of such crops?</i></p>	<p>↑ 114-3 cont'd</p>
<p>C. Evidently, a shift in cropping patterns was included in the model and forecasting of economic production, yet did not consider the suitability of certain areas within the region itself. For example, orchard crops like almonds cannot be planted in colder areas of the region, such as the mountainous areas, and the crops are also not suited for those soils in many cases. As such, not all crops are suited for all areas of the region.</p> <p><i>i. Why did the model and subsequent economic impacts not accurately reflect climate variability (as they currently existing) in the region when calculating a shift towards "higher value crops?"</i></p>	<p>114-4</p>
<p>D. It is not clear if the economic model of the value, after the implementation of any of the "alternatives," of future agricultural production included, or accounted for, the extreme economic impacts of a shift in crop production.</p> <p>1. For example, to shift from bare land, where wheat or hay might have one been grown, into a productive orchard may take several years at a cost of several thousand dollars per acre.</p> <p><i>i. Did the model and economic forecasts for any of the alternatives include the land preparation costs (such as those incurred when planting an orchard like deep-ripping, soil pH balancing treatments or amendments, cost & installation of irrigations systems, nursery costs for procurement of trees or vines, etc.), and if not, why?</i></p>	<p>114-5</p>
<p>2. During a shift to "high value crops" under the assumptions commented on by staff at the Chico meeting, say from grain crops to orchards, several years may pass before newly planted orchards bear any quantities of harvestable or marketable fruit or nuts.</p> <p><i>i. Did the economic model used to determine future agricultural production for any of the alternatives consider the economic loss of revenue to farmers, landowners, and to "third parties" such as processors, canners, packaging firms, herbicide applicators, custom harvesting firms, water districts, crop protection suppliers, and crop transportation (trucking) firms, and if the model and/or the economic information presented in the alternatives fail to include these types of economic losses for consideration? If so, why?</i></p>	<p>114-6</p>

3. During a shift from low value crops to high value crops, as was discussed at the Chico meeting by staff and members of the public, it was noted that the availability within the region of some of these lower value commodities such as hay, feed grains, and livestock feed, at certain times of the year may not be available to livestock producers at an economically feasible market price.

i. *Did the economic models used to determine the subsequent economic impacts on future agricultural production include costs to livestock producers who have indicated they could see significant costs incurred to source feed products such as hay and grain, outside of the region, or even outside of the State of California, should the preferred alternatives facilitate a shift in cropping patterns away from low value crops? If it failed to take these costs into consideration and show their impact, why not?*

114-7

III. As discussed in my comments above, staff seemed to indicate that the EIR for the preferred alternatives took into account a wide variety of environmental impacts. However, it appears as though the EIR failed to include negative impacts to the environment caused by the assumed shift in cropping patterns caused by the regulations under the alternatives.

I. During the assumed shift from low value grain crops towards higher value commodities such as fruits, nuts and vine crops, valuable foraging, nesting, and resting areas for hundreds of species of waterfowl and wildlife will no longer be available.

i. *For example, wheat, hay, and rice fields are home to both nesting and migrating waterfowl, and as forecasts under the alternatives have eluded to, a shift away from these types low value types of grain and field crops towards other crops such as orchards of almonds, walnuts, or prunes will reduce the overall area available for this nesting, foraging, and migrating waterfowl, as these types of high value crops are not conducive to those types of activities of waterfowl and wildlife, and the EIR should have mentioned this loss of habitat, as it currently exists in grain and field cropland, as a significant impact.*

114-8

ii. *Were mitigation costs, to provide for the loss of habitat as mentioned above, included under the costs of program alternatives in the noted economic impacts, and if not, why? The program EIR should include these costs.*

<p>2. It appeared as though the EIR failed to include potential groundwater related impacts due to increased groundwater use, as well as the associated increase in energy use by groundwater extraction, due to the assumed change in cropping patterns.</p>	<p>114-9</p>
<p>i. <i>The EIR should shed light on the potential for increased groundwater extraction due to the assumed shift from low value to high value crops. For example, many orchards and vineyards use groundwater as an irrigation source, despite being allocated surface water through a water district, as groundwater is simply easier, more efficient, and less labor intensive to use for irrigation through sprinkler or drip type apparatuses installed in the orchard, than surface water. The increased use of groundwater and energy used in its extraction and pressurizing of irrigation systems should be accounted for in the EIR.</i></p>	
<p>IV. In going forward with any of the alternatives or a combination of them, it is imperative that ongoing, publicly funded efforts for groundwater monitoring not be unnecessarily duplicated or changed.</p>	<p>114-10</p>
<p>A. For example, the over the past several years, voters through various propositions, and by way of allocation from the state legislature, have provided millions of dollars in funding and grants to public entities to create groundwater monitoring operations. These operations, which in some cases have been monitoring groundwater for several years, should not be overlooked, by staff or consultants working on the ILRP. Instead, these operations already being conducted should be sought out and utilized for their expertise in ongoing groundwater monitoring. They should also be considered in developing or changing any of the alternatives under the ILRP going forward. In addition, their historical data should not be marginalized in any way, and should be included and designated as sufficient for the purpose of historical groundwater data should that be necessary going forward.</p>	
<p>i. <i>For example, Butte County already conducts groundwater monitoring operations, funded primarily by the State of California. Were efforts like these ever considered when formulating the alternatives in the ILRP? In addition, the county works with several other counties in the project area on similar, regional, collaborative efforts. These local efforts should be highlighted and promoted going forward. It should be considered a waste of taxpayer funds to re-create or further regulate groundwater and groundwater management in these areas who are already actively monitoring.</i></p>	

V. The preferred alternative recommended for final adoption should be the one in which would cost industry, taxpayers and state's treasury the very least. Furthermore, funding and mitigation costs for these efforts, under any of the program alternatives, which would further regulate and cause economic hardships to should those who irrigate land, should be borne only by those landowners or farmers willing to participate on a **voluntary** level. In any other case, those seeking further information from the monitoring or regulation proposed by these alternatives should be held responsible for funding these efforts, i.e., "user fees." In nearly all cases, a government entity of some type has granted, in many cases by deeded right, to landowners the right to irrigate lands either through surface water deliveries, groundwater extraction, or through riparian rights (or combinations thereof). These rights should not be impeded upon by any means. Public agencies or other non governmental entities, whether through agency directive or court decree, which seek to place additional restrictions on the use of such water, should be held accountable for providing funding for performing any these tasks, directives, or mandates from the ILRP program alternatives.

114-11

- a. Further public input should be conducted on the program alternatives, as well as the EIR. The series of meetings held throughout the region over the past two months were not at all adequate. The use of "breakout" areas or rooms, lack of time allocated for questions and answers, and the lack of a general comment period (time) on the agenda during the meetings was not conducive to an environment which fostered healthy comments and questions from members of the public, but rather served to divide the room so that members of the public were not allowed to hear all the questions, comments, or their answers.

114-12

In closing, thank you for taking the time to appropriately review my comments. I look forward to my comments being addressed. If you need further assistance or clarification from me, please do not hesitate to contact me for assistance.

Ryan Schohr
1523 Ridgebook Way
Chico, CA 95928
530-570-7926 (cell)

3.4.43.1 Responses to Letter 114

114-1

See Master Response 17.

114-2

See Master Response 17.

114-3

See Master Response 17.

114-4

See Master Responses 16 and 17.

114-5

See Master Response 17.

114-6

See Master Response 17.

114-7

See Master Response 17.

114-8

The commenter is referred to Master Response 15 for a further discussion of the effects of agricultural land conversion.

114-9

There is the potential for changes in groundwater use as a result of agricultural land going out of production or changing crop types from implementation of the Long-term ILRP. However, it is not known where and to what extent land use change would occur. Because of the difficulty in predicting land use change, many of the potential indirect effects of this change are considered speculative. See Master Response 14.

See Chapter 4, Revisions to the Draft Program Environmental Impact Report, pages 4-2-4-8 in this Final PEIR for an updated discussion of air quality effects caused by implementation of one of the proposed IRLP alternatives related to the farmers switching from flood and furrow irrigation to pressurized irrigation management practices.

114-10

The existence of local groundwater management and monitoring efforts has been considered during the development of ILRP alternatives. These efforts are summarized in the description of

Alternative 1 (see Appendix A of the Draft PEIR, Appendix A, pages 7–8). Alternatives 2 and 6 incorporate means for the Central Valley Water Board to approve substitution of appropriate existing plans for the ILRP GQMP.

The development of orders (waivers, WDRs), under Alternative 6, specific to geographic areas would facilitate coordination between the ILRP and other programs. The geographically-based orders would allow the Central Valley Water Board and water quality coalitions to coordinate and consider existing practices and monitoring associated with DPR, local groundwater management programs, and other programs; consider existing local regulatory efforts; thus minimizing duplication of efforts and multiple overlapping regulatory requirements.

114-11

The comment's support for the least costly alternative and voluntary participation, and concerns regarding irrigation water rights will be considered in the development of the ILRP. Note that the ILRP is strictly a water quality program for waste discharge to state waters and does not apply to utilization of water rights. Any water right granted does not include a right to discharge waste to waters of the state.

114-12

The Central Valley Water Board disagrees that the opportunity for public input was inadequate and does not propose to hold additional meetings on the Draft PEIR. Over the course of more than two years, ample opportunity has been provided for public input (see Draft PEIR, pages 2-7-2-10). Additional opportunity for public input will be available when the Board considers the Final PEIR at the April 6/7/8, 2011 Board hearing.

3.4.44 Letter 13—Joan C. Townsend

Comment Letter IL13

Central Valley Regional Water Quality Control Board
Long-term Irrigated Lands Regulatory Program
Draft Programmatic Environmental Impact Report Public Comment Form

Name:	Joan C. Townsend
Mailing Address:	32 E Rio Bonito Rd Biggs, Ca 95917
Telephone No. (optional):	
Email (optional):	jobiggs@sbcglobal.net

Comments/Issues:

13-1

Our State is so broke!
How can we afford to
start or implement another
costly monitoring system
Stay w the #1 alternative!!

Please use additional sheets if necessary.

SUBMIT WRITTEN COMMENTS BY SEPTEMBER 27TH TO:

Mail: ILRP Comments
Ms. Megan Smith
630 K Street, Suite 400
Sacramento, CA 95814

Email: ILRPcomments@icfi.com

Website: http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/long_term_program_development

3.4.44.1 Responses to Letter 13

13-1

See Master Response 17.

3.4.45 Letter 128—Harry Turiello

RECEIVED
SACRAMENTO
CVRWOCB
10 SEP 14 PM 1:12

Comment Letter IL128

To: Regional Water Quality Control Board
From: Your name *HARRY TURIELLO*
Date: The date *9-13-10*
Re: The proposed Ag Waiver Fee Increase to the 2010-11 State Budget

As a member of the Northeastern California Water Association (NECWA), I am writing to the Regional Water Quality Control Board in **opposition** of the ag waiver water quality fee increase proposed in the Governor's 2010-11 budget.

Our small coalition in the Upper Pit River Region has been part of the Irrigated Lands Program since 2002 and an increase from the existing 12 cents per acre to 49 cents per acre will cause a significant financial impact on the already financially stressed local ag economy. Our geographic area consists of mostly small family farms and ranches and not the large factory farms. These proposed fee increases will have a greater impact on the smaller farming and ranching operations. We already struggle with the existing program costs, a 300+% increase alone as well as unforeseen and unregulated fee increases in the future could be detrimental to our farms and ranches.

128-1

Support us, NECWA, and support me by opposing the proposed ag waiver fee increase included in the 2010-11 California State Budget and to begin working on area specific programs that can be locally managed and affordable to our agriculture base.

Thank you for your support,

Harry J. Turiello

3.4.45.1 Responses to Letter 128

128-1

See Master Response 17.

3.4.46 Letter 76—Tony Turkovich, Button and Turkovich

Sep 27 2010 10:28AM BUTTON*TRUKOVICH, LLC 5307953331 p. 1
Comment Letter IL76

Ms. Megan Smith
630 K Street
Suite 400
Sacramento, Ca. 95814

Sept. 27,2010

Dear Ms. Smith,

I am writing to express my concern about the Long Term Irrigated Lands Regulatory Program as I understand the staff is proposing. It appears that this program is going to be very expensive to administer. That cost will be a major contributing factor in determining the future viability of agriculture in California. Farmers need to continue to increase their efficient use of water in order to minimize impacts on the environment. Likewise the Regulatory Program must be designed to be efficient in identifying areas that need attention and not smother agriculture in regulation and cost were problems don't exist. That does not appear to be the case in this proposal.

Our farm has had a very aggressive and expensive program of installing drip irrigation systems to increase the efficient use of water and to minimize impacts on the environment. We will probably suspend any further projects until the regulatory picture clears up. It does not make sense to spend huge amounts of money on the farm if the regulatory program will ultimately make the investment worthless.

It is my understanding that the Sacramento Valley has few groundwater quality problems and there are a number of agencies already testing. Why add another layer of regulation and cost to this effort? Why not utilize the efforts that are already there?

Please try to target the program to the problem areas and keep the cost affordable. Thank you for any consideration you can give to these thoughts.

Sincerely,

Tony Turkovich
Button and Turkovich

76-1

76-2

3.4.46.1 Responses to Letter 76

76-1

See Master Response 17.

76-2

This comment will be considered in the development of the Long-term ILRP.

3.4.47 Letter 29—Lucino and Ana Vargas

Dirección Regional de Control de Calidad de Aguas de Central Valley Programa Regulatorio a Largo Plazo de Tierras de Regadío Comment Letter IL29 Formulario de Comentarios Públicos Anteproyecto Programático de Impacto Ambiental	
Nombre:	Lucino y Ana Vargas
Domicilio:	22788 Ave 70 Ducor Co. P.O. Box 543 Ducor, CA 93218
No. Teléfono (optativo):	(559) 534-7539
Email (optativo):	
Comentarios/Problemas:	
<p>Somos dueños de un pozo privado. El pozo es relativamente nuevo pero mandamos examinar el agua para tener la confianza completa de consumirla. Fue una sorpresa para nosotros saber los resultados. El agua está contaminada con altos niveles de Nitratos. Debido a este problema de contaminación tenemos que comprar el agua para cocinar y beber, para nosotros a sido un grave problema y porque el pueblo más cercano a nuestro hogar está a 25 millas a sido muy costoso para nosotros.</p> <p>Deseamos que la mesa regional desarrolle algún plan para tierras irrigadas y nos ayude con este gran problema como es la contaminación del agua, puesto que es un producto tan esencial para nuestra vida.</p>	
Por favor utilice páginas extras si es necesario.	
PRESENTE COMENTARIOS POR ESCRITO EN O ANTES DEL 27 DE SEPTIEMBRE A:	
Dirección:	ILRP Comments Ms. Megan Smith 630 K Street, Suite 400 Sacramento, CA 95814
Email:	ILRPcomments@icfi.com
Página Web:	http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/long_term_program_development/

29-1

IL29

Lucino and Ana Vargas
22788 Ave. 70, Ducor, Ca.
PO Box 543, Ducor, CA 93218

559-534-7539

We are the owners of a private well. The well is relatively new but we sent the water to be tested so that we might be completely confident when using it. The results were surprising to us. The water is contaminated with high levels of nitrates. Because of this contamination problem, we have to buy water for cooking and drinking. This has been a serious problem for us because the town closest to our home is 25 miles away. It has been very expensive for us.

We would like the Regional Board to develop a plan for irrigated lands and help us with this large problem of water contamination since water is so essential to our lives.

Ana [illegible] Luciana Vargas
PO Box 543
Ducor, CA 93218

3.4.47.1 Responses to Letter 29

29-1

See Comment Letter 14, Response 1.

3.4.48 Letter 20—Darrell Voortman, Irrigator

Central Valley Regional Water Quality Control Board
Long-term Irrigated Lands Regulatory Program
Draft Programmatic Environmental Impact Report Public Comment Form

Comment Letter IL20

Name:	Darrell VOORTMAN Irrigator		
Mailing Address:	26254 JONES Rd Escalon Ca 95320		
Telephone No. (optional):	209 838 7064		
Email (optional):	NONE		

Comments/Issues: We all want clean water, I am disappointed when Stockton, Modesto, or Sacramento let raw sewage into rivers, that is the worst pollution! We test our deep well, our domestic well, and also the snow melt water that comes from irrigation dist, the worst we've had to do is chlorinate well for bacteria, we are blessed when I hear of finders in rivers, those that border creeks & rivers have got to be more carefull. Don't spray bright before rain storm or immediately after, we do our best to live by that. I feel it is one of the contributors, I've been able to not have my water leave my property.

If it's going to cost \$ more, then I'll throw up ridge & the owners of the roads & their ditches can keep their water also, right now road water comes on our property.

Be cost cautious in this time of expenses going up & what we get for crop is not going up as fast. Keep studies & testing simple, Cumberston acties will only

discourage those who should be more helpful.
DW

SUBMIT WRITTEN COMMENTS BY SEPTEMBER 27TH TO:

Mail: ILRP Comments
Ms. Megan Smith
630 K Street, Suite 400
Sacramento, CA 95814

Email: ILRPcomments@icfi.com

Website: http://www.waterboards.ca.gov/central/valley/water_issues/irrigated_lands/long_term_program_development/

3.4.48.1 Responses to Letter 20

20-1

Wastewater from the cities of Stockton, Modesto, and Sacramento is strictly regulated and the wastewater is treated. The Central Valley Water Board appreciates your efforts to prevent waste discharges from leaving your land.

20-2

See Master Response 17. The suggestions made in this comment will be considered in the development of the Long-term ILRP.

3.4.49 Letter 2—Kathryn Wilkins, Organic Farmer

Comment Letter IL2

From: Kathy Wilkins [kagrzd@yahoo.com]
Sent: Friday, 10 September 2010 10:20
To: ILRP Comments
Subject: written comments - workshop 9/9/2010

Thank you for taking to share your options for how to manage/mitigate the new ILRP.

Obviously none of them are a favorite, but as our state becomes more and more regulated in an effort to drive out farming, we must take the opportunity to pick our poison until we are able to move to another state or can afford to give up our livelihood for something else.

As I have seen what your general order has done to the dairy industry, you must make every effort to avoid repeating this. Our dairy men and women which provide a huge part of our agricultural economy, have been in the worst economic downturn in the industry for over 2 years now. In addition to this stress, which many have not survived, the remainder have had to pay for the implementation of these regulations.

Please do not let a few bad apples spoil the whole bunch. I can not tell you how many times I have heard, " these regulations have taken all the fun out of dairying." What you do not understand is that farming is a way of life. If you have never done it, you cannot begin to understand. If you repeat the dairy program you will succeed in killing the entire spirit of the farming community at large in California. The remaining dairies are not in business any more because they enjoy it, they stay because they love it and for the majority, it is all they know. Especially the older ones who immigrated over from Portugal and can barely speak english, but they contribute mightly to our economic stability of the California. They are not sucking the life out of it, as California has allowed others to do.

Your dairy program is extremely costly and invasive. Grant it there are a few out there that need the monitoring, but your program doesn't hold only the bad ones accountable, everyone is having to pay to the same extent for others bad choices and abuse of the land.

The "poison" that would be swallowed the easiest would be to begin with alternative 2 and identify the problematic areas and as those are indentified regionally, leave the farmers alone that are practicing sustainably. Then move these problem farmers into a higher level priority for that region and work through the tiered program regionally, as practices improve. These problem farms could be regulated under alternative 3 to begin with, then if there is no progress use alternative 4 and 5 to motivate the needed changes. While this would require continual survey of annual farming practices (as in the dairy program) it would alleviate unnecessary financial hardship on farms that are farming in a conservative and sustainable manor for the protection of their future and the land.

Thank you for your time.

Sincerely,
 Kathryn Wilkins, Organic Farmer

3

3.4.49.1 Responses to Letter 2

2-1

The comment will be considered in development of the Long-term ILRP.

2-2

The suggested phased approach is similar to the tiered approach and focus on greater threats to water quality proposed in Alternative 6 and will be considered in development of the Long-term ILRP.

3.4.50 Letter 103—John C. Zentner

Comment Letter IL103

John C. Zentner
3040 Omo Ranch Rd. • Somerset, CA 95684 • (530) 391-5564

September 27, 2010

ILRP Comments
Ms. Megan Smith
630 K Street, Suite 400
Sacramento, CA 95814

Subject: Comments on the Draft Program Environmental Impact Report for a Waste Discharge Program for Irrigated Lands within the Central Valley Region

Reference: El Dorado County Agricultural Water Quality Management Corporation letter dated September 24, 2010, same Subject

Dear Ms. Smith,

I am 64 years old and live in the southern portion of El Dorado County on a 13-acre parcel. In 2003 I began converting a 5-acre, 60-year old, dry-farmed walnut orchard to a 5-acre wine grape vineyard in the hopes of supplementing my retirement income by producing high quality wine grapes. I have been a member of the Sacramento Valley Water Quality Coalition since its inception. After reviewing the LTILRP Draft Program EIR, including the Economic Analysis and Staff Recommended Alternative, I am in doubt as to the future of my agriculture endeavors due to the obvious burdensome administrative and monitoring costs associated with the ground water portion of the new program, especially as those costs impact small farm operations. For the past 3 years my costs to be a member of the coalition have been \$20.00/acre in 2008, \$23.00/acre in 2009 and \$20.00/acre in 2010. I am seriously afraid that if any one of the alternatives of the LTILRP is implemented in the same manner as the existing program that my costs will at least double making it not economically worthwhile to continue farming.

103-1

There are no public water purveyors in our area. Our drinking and agricultural irrigation water comes from a single, 475-foot deep well that is in the middle of our vineyard. The quantity as well as the quality of our water is very precious. We use a drip irrigation system in the vineyard and practice deficit irrigation (at times not by choice but by the amount of available water in the well). There is no possible chance of irrigation water leaving the property. We participate in an Irrigation Management System that is partially subsidized by our County Water Agency. The use of neutron probes provides the weekly status of the water content of the first five feet of soil. We apply water only when the profile shows it is necessary to maintain vine health. When

103-2

LTILRP Comments from John Zentner
Page 2

September 27, 2010

we do apply water, the probes show that infiltration is generally only to the 4-foot level. There are no aquifers in our area. We have natural vegetative buffers from 30-150 feet wide around the vineyard that prevent sediment runoff during storm events. In short our operation does not discharge waste to either surface or ground waters of the state.

↑
103-2
cont'd

It is my understanding that since 2003 over \$400,000 has been spent by the El Dorado sub-coalition to prove that we have some of the finest, high-quality surface water in the state. There have been exceedances but in every case we have proven that irrigated agriculture was not the cause. With all of the money spent, not one penny of it went to improving or even maintaining the quality of surface water.

103-3

I have provided specific comments to the El Dorado Agricultural Water Quality Management Corporation and they are incorporated herein by reference. In your responses to our comments, please keep in mind the average size of our operations and the disproportionate burdens that these programs are putting on small, family owned, farms.

103-4

Sincerely,

John C. Zentner

From: John Zentner [zentnervineyard@gmail.com]
Sent: Monday, September 27, 2010 5:19 PM
To: ILRP Comments
Subject: LT ILRP Comments from an El Dorado Grape Grower
Attachments: JCZ LTILRP Comments.pdf

Ms. Smith,

I have tried to send the attached comments to you a number of times this afternoon and seem to have failed. I realize it is after the cut off time; however, please consider my comments.

Thank you,

John Zentner

*Attachment
concealed -
dup of IL103*

From: John Zentner [zentnervineyard@gmail.com]
Sent: Monday, September 27, 2010 5:25 PM
To: ILRP Comments
Subject: LTILRP Comments for an El Dorado Grape Grower who is having E-mail issues
Attachments: JCZ LTILRP Comments.pdf

Ms. Smith,

I have tried to forward my comments to you all afternoon and have finally corrected an error which kept them from transmitting. I realize it is after the cutoff time; however, please consider these comments as I have tried in good faith to get them to you.

Thank you,
John Zentner

*dep of
JL/103*

John C. Zentner
3040 Omo Ranch Rd. • Somerset, CA 95684 • (530) 391-5564

September 27, 2010

ILRP Comments
Ms. Megan Smith
630 K Street, Suite 400
Sacramento, CA 95814

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There are no public water purveyors in our area. Our drinking and agricultural irrigation water comes from a single, 475-foot deep well that is in the middle of our vineyard. The quantity as well as the quality of our water is very precious. We use a drip irrigation system in the vineyard and practice deficit irrigation (at times not by choice but by the amount of available water in the well). There is no possible chance of irrigation water leaving the property. We participate in an Irrigation Management System that is partially subsidized by our County Water Agency. The use of neutron probes provides the weekly status of the water content of the first five feet of soil. We apply water only when the profile shows it is necessary to maintain vine health. When we do apply water, the probes show that infiltration is generally only to the 4-foot level. There are no aquifers in our area. We have natural vegetative buffers from 30-150 feet wide around the vineyard that prevent sediment runoff during storm events.

LTLIRP Comments from John Zentner
Page 2

September 27, 2010

In short our operation does not discharge waste to either surface or ground waters of the state.

It is my understanding that since 2003 over \$400,000 has been spent by the El Dorado sub-coalition to prove that we have some of the finest, high-quality surface water in the state. There have been exceedances but in every case we have proven that irrigated agriculture was not the cause. With all of the money spent, not one penny of it went to improving or even maintaining the quality of surface water.

I have provided specific comments to the El Dorado Agricultural Water Quality Management Corporation and they are incorporated herein by reference. In your responses to our comments, please keep in mind the average size of our operations and the disproportionate burdens that these programs are putting on small, family owned, farms.

Sincerely,

John C. Zentner

3.4.50.1 Responses to Letter 103

103-1

See Master Response 17.

103-2

See Comment Letter 1, Response 5 and Master Response 12.

103-3

Monitoring is a critical component to any water quality program. Without monitoring, it would be difficult to determine whether the water was high quality and whether exceedances were associated with irrigated agriculture. The data collected through monitoring has been and will continue to inform the development and implementation of the ILRP.

103-4

See Master Response 17.