

3.4.51 Form Letter 1 Master, “Placer-Nevada-South Sutter-North Sacramento Sub-Watershed Group Ground Water Quality Monitoring,” Letter 11—Herman Schindler

September 15, 2010 Comment Letter IL11

Central Valley Regional Water Quality Control Board
ILRP Comments
Ms. Megan Smith
630 K Street, Suite 400
Sacramento, California 95814

Subject: Irrigated Lands Regulatory Program (ILRP) - Ground Water Quality Monitoring

As a grower in Placer County, and a member of the Placer-Nevada-South Sutter-North Sacramento Sub-Watershed Group (PNSSNS), I am concerned that the Central Valley Regional Water Quality Control Board (Regional Board) is adding more burdensome regulations that will put many growers out of business. Over the past six years, approximately \$300,000 has been drained from our ag community for this program. In fact, the recommended program will have a disproportional impact on smaller farming operations and some crop types. The *Economic Analysis* estimates it could cost a grower \$5000 to characterize surface and groundwater quality for Tier 1 low impact areas **in addition to costs for water quality testing.** 11-1

More specifically, I want to address the groundwater monitoring component to the Irrigated Lands Regulatory Program (ILRP). Pesticide contamination seems to be the driving concern behind this additional regulatory scheme, which greatly concerns me as this issue has already been addressed through existing regulation.


The California Department of Pesticide Regulation (DPR) has the primary responsibility for regulating all aspects of pesticide sales and use to protect the public health and the environment. DPR's mission is to evaluate and mitigate impacts of pesticide use, maintain the safety of the pesticide workplace, ensure product effectiveness, and encourage the development and use of reduced risk pest control practices while recognizing the need for pest management in a healthy economy. DPR is a department within the California Environmental Protection Agency, just like the Regional Board.


DPR already has the following regulations (Title 3 California Code of Regulations, Division 6) in place to protect groundwater from pesticide contamination including: 11-2

- Section 6416: Groundwater Protection Areas
- Section 6486: Restrictions for Groundwater Protection List Pesticides Listed in Section 6800(a)
- Section 6487.1: Artificial Recharge Basins
- Section 6487.2: Inside Canal and Ditch Banks
- Section 6487.3: Engineered Rights of Way within Groundwater Protection Areas
- Section 6487.4: Runoff Groundwater Protection Areas
- Section 6487.5: Leaching Groundwater Protection Areas
- Section 6609: Wellhead Protection
- Section 6800(a): List of Pesticides Determined to have the Potential to Pollute Groundwater

Not only is it redundant for the Regional Board to attempt to regulate something that is already regulated by DPR, but it is a poor use of public funds for two departments within the same agency to attempt to regulate the same thing for the same purpose. Moreover, Placer County, South Sutter Water District, Placer County Water Agency, the Natomas Mutual Water Company, the City of Lincoln, and the City of Roseville have extensive groundwater monitoring data and programs to keep groundwater clean.

Respectfully,




Mr. Herman A. Schindler
2342 Paddock Ln.
Newcastle, CA 95658-9746

3.4.51.1 Responses to Letter 11**11-1**

See Master Response 17.

11-2

Although there are other existing programs that address groundwater quality throughout the Central Valley; however the Central Valley Water Board is not aware of any consistent requirements in place to ensure that non-pesticide waste discharges associated with irrigated agriculture do not impair beneficial uses of groundwater. As described in the Draft PEIR, Appendix A, Section III.C.2 (page 45), a considerable number of wells in the Central Valley have high levels of nitrate. The use of chemical nitrogen-based fertilizers has been found to be a potential cause of nitrate contamination of groundwater in agricultural areas (see Draft PEIR, Appendix A, pages 99-100).

See Comment Letter 99, Response 1.

3.4.52 Letter 68 (Form 1)—Anonymous

Comment Letter IL68

September 15, 2010

Central Valley Regional Water Quality Control Board
ILRP Comments
Ms. Megan Smith
630 K Street, suite 400
Sacramento, California 95814

Subject: Irrigated Lands Regulatory Program (ILRP) - Ground Water Quality Monitoring

As a grower in Placer County, and a member of the Placer-Nevada-South Sutter-North Sacramento Sub-Watershed Group (PNSSNS), I am concerned that the Central Valley Regional Water Quality Control Board (Regional Board) is adding more burdensome regulations that will put many growers out of business. Over the past six years, approximately \$300,000 has been drained from our ag community for this program. In fact, the recommended program will have a disproportional impact on smaller farming operations and some crop types. The *Economic Analysis* estimates it could cost a grower \$5000 to characterize surface and groundwater quality for Tier 1 low impact areas in addition to costs for water quality testing.

More specifically, I want to address the groundwater monitoring component to the Irrigated Lands Regulatory Program (ILRP). Pesticide contamination seems to be the driving concern behind this additional regulatory scheme, which greatly concerns me as this issue has already been addressed through existing regulation.

The California Department of Pesticide Regulation (DPR) has the primary responsibility for regulating all aspects of pesticide sales and use to protect the public health and the environment. DPR's mission is to evaluate and mitigate impacts of pesticide use, maintain the safety of the pesticide workplace, ensure product effectiveness, and encourage the development and use of reduced risk pest control practices while recognizing the need for pest management in a healthy economy. DPR is a department within the California Environmental Protection Agency, just like the Regional Board.

DPR already has the following regulations (Title 3 California Code of Regulations, Division 6) in place to protect groundwater from pesticide contamination including:

Section 6416: Groundwater Protection Areas
Section 6486: Restrictions for Groundwater Protection List Pesticides Listed in Section 6800(a)
Section 6487.1: Artificial Recharge Basins
Section 6487.2: Inside Canal and Ditch Banks
Section 6487.3: Engineered Rights of Way within Groundwater Protection Areas
Section 6487.4: Runoff Groundwater Protection Areas
Section 6487.5: Leaching Groundwater Protection Areas
Section 6609: Wellhead Protection
Section 6800(a): List of Pesticides Determined to have the Potential to Pollute Groundwater

Not only is it redundant for the Regional Board to attempt to regulate something that is already regulated by DPR, but it is a poor use of public funds for two departments within the same agency to attempt to regulate the same thing for the same purpose. Moreover, Placer County, South Sutter Water District, Placer County Water Agency, the Natomas Mutual Water Company, the City of Lincoln, and the City of Roseville have extensive groundwater monitoring data or programs to keep groundwater clean.

Respectfully,

*Thank you - I'm now out of business
and will drop out of the monitoring program.* 68-1

3.4.52.1 Responses to Letter 68

68-1

The Central Valley Water Board is sensitive to the economic impacts of new regulations as it develops the Long-term ILRP. The Board has made significant efforts to meet requirements for water quality protection while considering costs (see Draft PEIR, Appendix A, pages 136–142).

3.4.53 Letter 64 (Form 1)—Lance and Gay Columbel

September 15, 2010

Comment Letter IL64

Central Valley Regional Water Quality Control Board

ILRP Comments

Ms. Megan Smith

PLEASE READ ADDENDUM

630 K Street, suite 400

Sacramento, California 95814

Subject: Irrigated Lands Regulatory Program (ILRP) - Ground Water Quality Monitoring

As a grower in NEVADA County, and a member of the Placer-Nevada-South Sutter-North Sacramento Sub-Watershed Group (PNSSNS), I am concerned that the Central Valley Regional Water Quality Control Board (Regional Board) is adding more burdensome regulations that will put many growers out of business. Over the past six years, approximately \$300,000 has been drained from our ag community for this program. In fact, the recommended program will have a disproportional impact on smaller farming operations and some crop types. The *Economic Analysis* estimates it could cost a grower \$5000 to characterize surface and groundwater quality for Tier 1 low impact areas in addition to costs for water quality testing.

More specifically, I want to address the groundwater monitoring component to the Irrigated Lands Regulatory Program (ILRP). Pesticide contamination seems to be the driving concern behind this additional regulatory scheme, which greatly concerns me as this issue has already been addressed through existing regulation.

The California Department of Pesticide Regulation (DPR) has the primary responsibility for regulating all aspects of pesticide sales and use to protect the public health and the environment. DPR's mission is to evaluate and mitigate impacts of pesticide use, maintain the safety of the pesticide workplace, ensure product effectiveness, and encourage the development and use of reduced risk pest control practices while recognizing the need for pest management in a healthy economy. DPR is a department within the California Environmental Protection Agency, just like the Regional Board.

DPR already has the following regulations (Title 3 California Code of Regulations, Division 6) in place to protect groundwater from pesticide contamination including:

Section 6416: Groundwater Protection Areas

Section 6486: Restrictions for Groundwater Protection List Pesticides Listed in Section 6800(a)

Section 6487.1: Artificial Recharge Basins

Section 6487.2: Inside Canal and Ditch Banks

Section 6487.3: Engineered Rights of Way within Groundwater Protection Areas

Section 6487.4: Runoff Groundwater Protection Areas

Section 6487.5: Leaching Groundwater Protection Areas

Section 6609: Wellhead Protection

Section 6800(a): List of Pesticides Determined to have the Potential to Pollute Groundwater

Not only is it redundant for the Regional Board to attempt to regulate something that is already regulated by DPR, but it is a poor use of public funds for two departments within the same agency to attempt to regulate the same thing for the same purpose. Moreover, Placer County, South Sutter Water District, Placer County Water Agency, the Natomas Mutual Water Company, the City of Lincoln, and the City of Roseville have extensive groundwater monitoring data or programs to keep groundwater clean.

Respectfully,

Janice and Jay Columbus
jamb@thejamesranch.com

We would like to emphasize that there are real people affected by your decisions. Your premise is that anybody who irrigates is guilty of poor farming practices. Irrigation is an essential component of farming in California due to the dry summers. Without irrigation, the small farms and ranches that are targeted by your agency would not be capable of viable production and would cease to exist. 64-1

We beg you to work within the existing governmental infrastructure which, as the letter states, already has the regulatory agencies in place to monitor potential water contamination. Additional layers of government will not enhance efficiency but they will add substantially to the cost through higher taxes and unmanageable fees. 64-2

We are a small family farm that is struggling to survive. We would not be able to absorb the arbitrary and expensive fees that you are proposing and that would continue to increase in order for you to fund a larger agency. Our farm, like many similar to it, would dry up and die, a legacy for bureaucrats who have never known the risks and hardships of a private farming enterprise.

3.4.53.1 Responses to Letter 64

64-1

The Central Valley Water Board appreciates that people will be affected by the Board's decision – those who operate irrigated lands and those who rely on the state's precious surface and groundwater resources. The ILRP reports do not suggest that the act of irrigation is a poor farming practice. The focus is on encouraging the adoption of management practices, where such practices are not already in place, to minimize or eliminate the discharge of wastes from irrigated lands to waters of the state.

64-2

See Comment Letter 108, Response 1 and Comment Letter 1, Response 45.

Also see Master Response 17.

3.4.54 Letter 140 (Form 1)—Phyllis Espinoza, Bushy Creek Nursery

September 15, 2010

Comment Letter IL140

Central Valley Regional Water Quality Control Board
ILRP Comments
Ms. Megan Smith
630 K Street, suite 400
Sacramento, California 95814

Subject: Irrigated Lands Regulatory Program (ILRP) - Ground Water Quality Monitoring

As a grower in Placer County, and a member of the Placer-Nevada-South Sutter-North Sacramento Sub-Watershed Group (PNSSNS), I am concerned that the Central Valley Regional Water Quality Control Board (Regional Board) is adding more burdensome regulations that will put many growers out of business. Over the past six years, approximately \$300,000 has been drained from our ag community for this program. In fact, the recommended program will have a disproportional impact on smaller farming operations and some crop types. The *Economic Analysis* estimates it could cost a grower \$5000 to characterize surface and groundwater quality for Tier 1 low impact areas in addition to costs for water quality testing.

More specifically, I want to address the groundwater monitoring component to the Irrigated Lands Regulatory Program (ILRP). Pesticide contamination seems to be the driving concern behind this additional regulatory scheme, which greatly concerns me as this issue has already been addressed through existing regulation.

The California Department of Pesticide Regulation (DPR) has the primary responsibility for regulating all aspects of pesticide sales and use to protect the public health and the environment. DPR's mission is to evaluate and mitigate impacts of pesticide use, maintain the safety of the pesticide workplace, ensure product effectiveness, and encourage the development and use of reduced risk pest control practices while recognizing the need for pest management in a healthy economy. DPR is a department within the California Environmental Protection Agency, just like the Regional Board.

DPR already has the following regulations (Title 3 California Code of Regulations, Division 6) in place to protect groundwater from pesticide contamination including:

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Section 6487.3: Engineered Rights of Way within Groundwater Protection Areas
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Not only is it redundant for the Regional Board to attempt to regulate something that is already regulated by DPR, but it is a poor use of public funds for two departments within the same agency to attempt to regulate the same thing for the same purpose. Moreover, Placer County, South Sutter Water District, Placer County Water Agency, the Natomas Mutual Water Company, the City of Lincoln, and the City of Roseville have extensive groundwater monitoring data or programs to keep groundwater clean.

Respectfully,



Phyllis Espinoza
Brushy Creek Nursery
P O Box 539
Foresthill, Ca 95631

PS. We are a one acre nursery and if we had to pay \$5,000. a year we would have to go out of business. As it is because of the economy our Sales are down 70% the last two years. We are just barely hanging on. 140-1

3.4.54.1 Responses to Letter 140

140-1

See Master Response 17.

3.4.55 Letter 65 (Form 1)—Marian C. Jewett

Comment Letter IL65

September 15, 2010

Central Valley Regional Water Quality Control Board
ILRP Comments
Ms. Megan Smith
630 K Street, suite 400
Sacramento, California 95814

Subject: Irrigated Lands Regulatory Program (ILRP) - Ground Water Quality Monitoring

As a grower in Nevada County, and a member of the Placer-Nevada-South Sutter-North Sacramento Sub-Watershed Group (PNSSNS), I am concerned that the Central Valley Regional Water Quality Control Board (Regional Board) is adding more burdensome regulations that will put many growers out of business. Over the past six years, approximately \$300,000 has been drained from our ag community for this program. In fact, the recommended program will have a disproportional impact on smaller farming operations and some crop types. The *Economic Analysis* estimates it could cost a grower \$5000 to characterize surface and groundwater quality for Tier 1 low impact areas in addition to costs for water quality testing.

This will cut tax revenues on income even more.

65-1

More specifically, I want to address the groundwater monitoring component to the Irrigated Lands Regulatory Program (ILRP). Pesticide contamination seems to be the driving concern behind this additional regulatory scheme, which greatly concerns me as this issue has already been addressed through existing regulation. How many more bureaucratic rules and waste of money do we need?? We are already in financial turn!
The California Department of Pesticide Regulation (DPR) has the primary responsibility for regulating all aspects of pesticide sales and use to protect the public health and the environment. DPR's mission is to evaluate and mitigate impacts of pesticide use, maintain the safety of the pesticide workplace, ensure product effectiveness, and encourage the development and use of reduced risk pest control practices while recognizing the need for pest management in a healthy economy. DPR is a department within the California Environmental Protection Agency, just like the Regional Board.

65-2

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Respectfully,

Marian C. Jewett
16416 Jewett Lane, Grass Valley, CA 95945

3.4.55.1 Responses to Letter 65

65-1

See Master Response 17.

65-2

See Master Response 17.

3.4.56 Letter 130 (Form 1)—Mike Pasner, Indian Springs Organic Farm

Comment Letter IL130

September 15, 2010

Central Valley Regional Water Quality Control Board
ILRP Comments
Ms. Megan Smith
630 K Street, suite 400
Sacramento, California 95814

Subject: Irrigated Lands Regulatory Program (ILRP) - Ground Water Quality Monitoring

As a grower in Yuba County, and a member of the Placer-Nevada-South Sutter-North Sacramento Sub-Watershed Group (PNSSNS), I am concerned that the Central Valley Regional Water Quality Control Board (Regional Board) is adding more burdensome regulations that will put many growers out of business. Over the past six years, approximately \$300,000 has been drained from our ag community for this program. In fact, the recommended program will have a disproportional impact on smaller farming operations and some crop types. The *Economic Analysis* estimates it could cost a grower \$5000 to characterize surface and groundwater quality for Tier 1 low impact areas in addition to costs for water quality testing.

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Respectfully,

Over

130-1
We are an Organic farm with no tail water ditch run off. We should be given a waiver from this entire program, we do not pollute, we have not polluted in our 2+ years of operation & am once again protesting the necessity of this membership

Respectfully Mike Poon

3.4.56.1 Responses to Letter 130

130-1

The current ILRP regulates waste discharge to surface water only. If a farm does not discharge waste to surface waters, there would be no need to apply for coverage under the current ILRP. All Long-term ILRP alternatives, except Alternative 1, would regulate irrigated agricultural waste discharges to surface and groundwater. Under the Long-term ILRP, where a farm's waste discharge does not have the potential to affect the quality of the state's surface or groundwater, there would be no need to apply for coverage under the Long-term ILRP. In addition, the concept of having minimal requirements for growers operating under a certified farm management plan has been considered in the development of the Long-term ILRP (Alternatives 3 and 6).


3.4.57 Letter 63 (Form 1)—Don Rosa, Natomas Landowner and Farmer

September 15, 2010	Comment Letter IL63
<p>Central Valley Regional Water Quality Control Board ILRP Comments Ms. Megan Smith 630 K Street, suite 400 Sacramento, California 95814</p>	
<p>Subject: Irrigated Lands Regulatory Program (ILRP) - Ground Water Quality Monitoring</p>	
<p>As a grower in Sacramento County, and a member of the Placer-Nevada-South Sutter-North Sacramento Sub-Watershed Group (PNSSNS), I am concerned that the Central Valley Regional Water Quality Control Board (Regional Board) is adding more burdensome regulations that will put many growers out of business. Over the past six years, approximately \$300,000 has been drained from our ag community for this program. In fact, the recommended program will have a disproportional impact on smaller farming operations and some crop types. The <i>Economic Analysis</i> estimates it could cost a grower \$5000 to characterize surface and groundwater quality for <u>Tier 1 low impact areas in addition to costs for water quality testing.</u></p>	
<p>More specifically, I want to address the groundwater monitoring component to the Irrigated Lands Regulatory Program (ILRP). Pesticide contamination seems to be the driving concern behind this additional regulatory scheme, which greatly concerns me as this issue has already been addressed through existing regulation.</p>	
<p>The California Department of Pesticide Regulation (DPR) has the primary responsibility for regulating all aspects of pesticide sales and use to protect the public health and the environment. DPR's mission is to evaluate and mitigate impacts of pesticide use, maintain the safety of the pesticide workplace, ensure product effectiveness, and encourage the development and use of reduced risk pest control practices while recognizing the need for pest management in a healthy economy. DPR is a department within the California Environmental Protection Agency, just like the Regional Board.</p>	
<p>DPR already has the following regulations (Title 3 California Code of Regulations, Division 6) in place to protect groundwater from pesticide contamination including:</p>	
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<p>Not only is it redundant for the Regional Board to attempt to regulate something that is already regulated by DPR, but it is a poor use of public funds for two departments within the same agency to attempt to regulate the same thing for the same purpose. Moreover, Placer County, South Sutter Water District, Placer County Water Agency, the Natomas Mutual Water Company, the City of Lincoln, and the City of Roseville have extensive groundwater monitoring data or programs to keep groundwater clean.</p>	
<p>Our family has been in Natomas for almost 100 years. Our farm property is now leased out due to the high cost of farming. Because of the high fees and taxes already in place, the assessments from the Natomas Water Company, Sacramento Area Flood Control Agency, and the PNSSNS, it will be impossible to hold our farm property with any more added burden. We already must take from our regular livelihoods to support this</p>	<p>63-1 ↓</p>

property. In other words, we work other jobs to subsidize all those above. Sooner or later, it must come to an end. We cannot even sell the property because of the already high costs of both the tenant and land owner. /

It is time for our government and agencies to show some fairness and common sense.

Respectfully,



Don Rosa
8689 Bader Road
Elk Grove, CA 95624

Natomas Landowner and Farmer

↑ 63-1
cont'd

3.4.57.1 Responses to Letter 63

63-1

See Master Response 17.

3.4.58 Form Letter 2 Master, “Comments on Proposal for Long-Term Irrigated Lands Program,” Letter 9—Kathleen Denison

Comment Letter IL9

September 2010

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

RE: Comments on Proposal for Long-Term Irrigated Lands Program


I am very concerned about the proposed Long-Term Irrigated Lands Program. I have the following concerns:

<p>Agricultural Impacts</p> <ul style="list-style-type: none"> • What are the potential impacts to agricultural lands and potential loss of farmland due to increased regulatory costs? (Will lands be taken out of production due to high economic costs to comply with the requirements?) 	9-1
<p>Economics and Cost</p> <ul style="list-style-type: none"> • Adequacy and appropriateness of the economic analysis to your region. (As a general matter, there are numerous inaccuracies in the economic analysis that sway the economic results. • Economic impacts and costs to comply for individuals and coalitions—Reasonable? Realistic? Feasible to continue farming? 	9-2 9-3
<p>Surface Water (Issues relating to the Recommended Program Alternative)</p> <ul style="list-style-type: none"> • Priority surface water bodies are defined as those water bodies or tributaries with aquatic life, drinking water, and human consumption beneficial uses or tributary streams with identified municipal or domestic drinking water intakes. The use of the tributary rule to determine which surface water bodies are considered priority may potentially expand the number of water bodies beyond what should be a priority (see Appendix A, p. 159). 	9-4
<p>Groundwater Quality (Issues relating to the Recommended Program Alternative)</p> <ul style="list-style-type: none"> • Which groundwater aquifers are considered high priority? Has data been collected and analyzed from local and regional groundwater monitoring programs? If not, when will this be done? 	9-5
<p>Groundwater</p> <ul style="list-style-type: none"> • Possible areas of duplicity with existing monitoring efforts if the LT-ILRP adds a groundwater monitoring element, especially if it does not utilize existing local groundwater quality programs such as SB 1938, and Integrated Regional Management Plans. • How will existing local groundwater monitoring programs be used for obtaining groundwater quality information? • What is the definition of “discharges to groundwater?” Concerns with point of discharge and first encounter of groundwater since there are areas where first encountered groundwater is currently not nor historically been usable for drinking water or agricultural use. • The PEIR indicates that all ag operations can affect groundwater (ie: the mere act of irrigating a crop is considered a discharge to groundwater that causes degradation). This places the burden to prove no impact on the grower (grower has to prove way out of being regulated). What science or data was used to determine that all agricultural operations negatively affect groundwater? Were geographic areas concerned? Depth of groundwater? Use of drip or controlled irrigation? 	9-6 9-7 9-8

<ul style="list-style-type: none"> • How would a grower or coalition determine the nature of discharges to groundwater? 	<p>↑ 9-8 cont'd</p>
<ul style="list-style-type: none"> • Timelines for compliance do not seem reasonable or feasible. For example, the 18 month period to prepare groundwater management plans is infeasible for many, if not all growers. 	<p>9-9</p>
<ul style="list-style-type: none"> • Additional information is needed regarding groundwater monitoring requirements. Are existing wells sufficient or is there an expectation that additional monitoring wells will be required? 	<p>9-10</p>
<p>General</p> <ul style="list-style-type: none"> • Additional information is needed regarding the statements that allow for periodic review of surface and groundwater plans by third parties and "interested parties" (see Appendix A, pp. 154-155). What role will the public now have? 	<p>9-11</p>
<ul style="list-style-type: none"> • The Draft PEIR identifies potential increase of greenhouse gas emissions from agricultural activities. What about carbon sequestration? Was that taken into account? 	<p>9-12</p>
<ul style="list-style-type: none"> • Within the Recommended Program, what is the process for moving between tiers? 	<p>9-13</p>
<ul style="list-style-type: none"> • Can portions of a program (i.e. constituents, sub-watersheds) move between tiers? 	<p>9-14</p>
<ul style="list-style-type: none"> • What is the point of compliance (edge of field, drain, root zone...) for the LT-ILRP and what is the process for determining this? 	<p>9-15</p>
<ul style="list-style-type: none"> • How does a coalition "prove" an area has no serious problems and can work their way out of the obligations? 	<p>9-16</p>
<ul style="list-style-type: none"> • What are the specifics to qualify as a "lower threat?" How does this designation work for certain geographic areas such as mountain valleys, foothill areas of limited use, or areas of limited water quality problems? To be "lower threat," can a grower be considered lower threat for surface water or groundwater, or must one be classified as a lower threat to both surface and groundwater? 	<p>9-17</p>
<ul style="list-style-type: none"> • Who exactly "certifies" a management plan? Does such a plan have to be submitted to the Regional Board? How do we address "proprietary" or confidential business information? 	<p>9-18</p>
<ul style="list-style-type: none"> • Additional information is needed regarding the possibility of 8 to 12 orders. How will multiple orders work with the existing coalition structure? Will new coalitions be formed? 	<p>9-18</p>

I have real concerns about the program and how it will affect my business.

Sincerely,



Signature

Almond grower

Printed Name Kathleen Denison

Address Po Box 122
Dunnigan CA 95937

3.4.58.1 Responses to Letter 9

9-1

This issue is addressed in Chapter 5, Section 5.10, Agricultural Resources, of the Draft PEIR and in the Draft ILRP Economics Report. The cost of compliance with the ILRP was the primary factor used in determining how much agricultural land could potentially be converted under each alternative.

9-2

See Master Response 17.

9-3

See Master Response 17.

9-4

The comment has not provided any specific examples of tributary water bodies that should not be considered priority water bodies, thus, the Central Valley Water Board is unable to ascertain the specific concerns. Implementation of the Long-term ILRP would require consistency with Water Quality Control Plan requirements and other state policy. The tributary rule along with Water Quality Control Plans establishes the beneficial uses to be protected.

Also see Comment Letter 1, Response 34.

9-5

Development of the Long-term ILRP is currently being undertaken at a programmatic level. This means that site-specific and other waste-specific information have not been considered in detail (e.g., prioritization of water bodies, consideration of site-specific monitoring data). These site-specific analyses will occur during development of ILRP WDRs and waivers and subsequent water quality monitoring and management plans.

9-6

See Comment Letter 114, Response 10.

9-7

See Master Responses 12 and 18. Also see Comment Letter 9, Response 14.

9-8

See Master Response 12.

9-9

See Master Response 13. Also see Comment Letter 111, Response 31 and Comment Letter 102, Response 9.

9-10

It is anticipated that existing wells will be utilized for collection of groundwater samples provided that the well is properly constructed (appropriate depth, screened interval, and surface seal).

If appropriate wells do not exist in an area or region, installation of a monitoring well(s) may be necessary. Determination of the need for additional wells will depend on the results of any vulnerability analysis that has been conducted, an assessment of the management practices that have been implemented in the area, and an assessment of the beneficial uses of the aquifers in the areas that have limited well data.

9-11

See Comment Letter 1, Response 48.

9-12

See Master Response 15.

9-13

Under Alternative 6, the specific details of the process for moving between tiers would be clarified during the preparation of implementation mechanisms (WDRs/ waivers). Figure 22 of the Draft PEIR, Appendix A (page 153) indicates that reassessment of low priority areas would occur every 5 years (areas under waivers) and that the reassessment timeframe for high priority areas is “to be determined” and dependent on the time schedule for compliance with water quality objectives (or the nature of the water quality problem). Regardless of the reassessment timeframe, the results of water quality monitoring may be used to change the priority of an area. Portions of a larger geographic area governed by WDRs can have different tiers and move between tiers. Also see Comment Letter 9, Response 15.

9-14

Water quality objectives have been established in Basin Plans for the protection of beneficial uses. These objectives apply in surface and groundwater of the state for those waters that have the applicable uses the objectives were developed to protect. For surface waters, the point of compliance is in the receiving water body at the point of waste discharge. For groundwater, the point of compliance is generally in first encountered groundwater. Compliance monitoring is generally geared toward determining whether the waste discharge is causing degradation or an exceedance of objectives. This can be accomplished in surface waters by monitoring effluent and receiving waters, receiving waters, and in some cases, effluent only. In groundwater, usually upgradient groundwater quality is compared with downgradient groundwater quality to determine whether waste discharge is causing degradation or exceedance of water quality objectives.

9-15

As described in Draft PEIR, Chapter 3, Alternatives 1, 2, and 6 include coalitions or third-party lead entities. Under the current ILRP (Alternative 1) areas are identified, and assessed heightened management requirements where there are identified water quality problems (e.g., areas under SWQMPs). The other third-party lead entity alternatives also include mechanisms for heightened

management and monitoring requirements in areas with identified water quality problems (Tier classification, SWQMP/GWQMP).

Under the current ILRP (Alternative 1), the Central Valley Water Board Executive Officer may approve the removal of SWQMP requirements upon review of monitoring data and other information indicating that the problem has been solved or irrigated agriculture is not a contributing source.

Alternatives 2 and 6 would be implemented in a similar manner, where the Executive Officer would review and provide approval for a reduction in priority (SWQMP/GWQMP for Alternative 2 and tier for Alternative 6).

Continued development of any Long-term ILRP with a coalition lead entity will include clarification that the Executive Officer may approve a reduced priority classification (e.g., move from Tier 2 to Tier 1; removal of SWQMP requirements) where there is monitoring data or other information justifying the reduction in priority.

9-16

See Master Response 7. Also, details concerning regional implementation of the Long-term ILRP will be developed as the program's enforcing orders and waivers are created.

9-17

The certified farm water quality management plan (Alternatives 3 and 6-optional) could be certified by the Central Valley Water Board or an approved certification entity.

As in the current ILRP, any information meeting the applicable legal tests for proprietary or confidential business information would not be made available to the public.

9-18

There are currently eight water quality coalitions approved under the current program (see Draft PEIR, Appendix A pages 7 and 145). The Central Valley Water Board does not have the authority to require that the current coalitions continue under the Long-term ILRP nor that new coalitions are formed. The Board assumes that the existing coalitions would continue to coordinate implementation of the Long-term ILRP. It is also possible that additional coalitions may form to facilitate more focused implementation of ILRP requirements.

3.4.59 Letter 73 (Form 2)—John Barbee

Comment Letter IL73

September 2010

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

RE: Comments on Proposal for Long-Term Irrigated Lands Program

I am very concerned about the proposed Long-Term Irrigated Lands Program. I have the following concerns:

Agricultural Impacts

- What are the potential impacts to agricultural lands and potential loss of farmland due to increased regulatory costs? (Will lands be taken out of production due to high economic costs to comply with the requirements?)

Economics and Cost

- Adequacy and appropriateness of the economic analysis to your region. (As a general matter, there are numerous inaccuracies in the economic analysis that sway the economic results.
- Economic impacts and costs to comply for individuals and coalitions—Reasonable? Realistic? Feasible to continue farming?

Surface Water (Issues relating to the Recommended Program Alternative)

- Priority surface water bodies are defined as those water bodies or tributaries with aquatic life, drinking water, and human consumption beneficial uses or tributary streams with identified municipal or domestic drinking water intakes. The use of the tributary rule to determine which surface water bodies are considered priority may potentially expand the number of water bodies beyond what should be a priority (see Appendix A, p. 159).

Groundwater Quality (Issues relating to the Recommended Program Alternative)

- Which groundwater aquifers are considered high priority? Has data been collected and analyzed from local and regional groundwater monitoring programs? If not, when will this be done?

Groundwater

- Possible areas of duplicity with existing monitoring efforts if the LT-ILRP adds a groundwater monitoring element, especially if it does not utilize existing local groundwater quality programs such as SB 1938, and Integrated Regional Management Plans.
- How will existing local groundwater monitoring programs be used for obtaining groundwater quality information?
- What is the definition of "discharges to groundwater?" Concerns with point of discharge and first encounter of groundwater since there are areas where first encountered groundwater is currently not nor historically been usable for drinking water or agricultural use.
- The PEIR indicates that all ag operations can affect groundwater (ie: the mere act of irrigating a crop is considered a discharge to groundwater that causes degradation). This places the burden to prove no impact on the grower (grower has to prove way out of being regulated). What science or data was used to determine that all agricultural operations negatively affect groundwater? Were geographic areas concerned? Depth of groundwater? Use of drip or controlled irrigation?

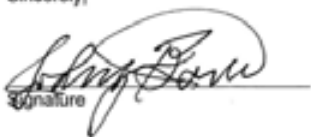
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- Timelines for compliance do not seem reasonable or feasible. For example, the 18 month period to prepare groundwater management plans is infeasible for many, if not all growers.
- Additional information is needed regarding groundwater monitoring requirements. Are existing wells sufficient or is there an expectation that additional monitoring wells will be required?

General

- Additional information is needed regarding the statements that allow for periodic review of surface and groundwater plans by third parties and "interested parties" (see Appendix A, pp. 154-155). What role will the public now have?
- The Draft PEIR identifies potential increase of greenhouse gas emissions from agricultural activities. What about carbon sequestration? Was that taken into account?
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- Who exactly "certifies" a management plan? Does such a plan have to be submitted to the Regional Board? How do we address "proprietary" or confidential business information?
- Additional information is needed regarding the possibility of 8 to 12 orders. How will multiple orders work with the existing coalition structure? Will new coalitions be formed?

I have real concerns about the program and how it will affect my business.

Sincerely,


signature

Printed Name JOHN Y. BARBIC
 Address 26089 HWY 128
WINTERS, CA. 95604

THIS IS ANOTHER "BOOTLEG TAX"

73-1

3.4.59.1 Responses to Letter 73

73-1

See Master Response 17.

3.4.60 Letter 135 (Form 2)—Dennis Alan Bruggman

Comment Letter IL135

September 2010

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

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- General • *Why doesn't the State of California pay for the chemical etc. Assessments state for*
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I have real concerns about the program and how it will affect my business.

Sincerely,

Dennis Alan Bruggman
Signature

Printed Name Dennis Alan Bruggman
Address 4124 Via Lado
Torrance, CA 90505

- (1) Farmers need carbon credits for CO₂ etc. they crop take from the atmosphere. *↳ greenhouse gases* | 135-1 (removed)
- (2) The state needs to pay for the assay rather than farmers. | 135-2
- (3) Local County Landuse control is required rather than at the state level. | 135-3
- Dennis Alan Bruggman*

3.4.60.1 Responses to Letter 135

135-1

See Master Response 15.

135-2

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

135-3

There is no suggestion in any of the alternatives that the Central Valley Water Board would require or encourage land use changes.

3.4.61 Letter 67 (Form 2)—Franklin Espriella

Comment Letter IL67

PLEASE BASE DISCUSSIONS ON MEANING FULL + REALISTIC GOALS WHICH WILL BENEFIT ALL OF US EQUALLY!

67-1

September 2010

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

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I have real concerns about the program and how it will affect my business.

Sincerely,


Signature

Printed Name FRANKLIN ESPINOSA
 Address POB 206
GUINDA, CA 95637

3.4.61.1 Responses to Letter 67

67-1

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

3.4.62 Letter 71 (Form 2)—William Fletcher, Trustee and Margaret C. Fletcher, Trustee

Comment Letter IL71

September 2010

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

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I have real concerns about the program and how it will affect my business.

Sincerely,

Signature William F Fletcher trustee Printed Name William F. FLETCHER Trustee
MARGARET C. FLETCHER
 Address 2305D Co Rd 94
WOODLAND, CA 95665

*My question is. When you have put agriculture out of business with all your regulations and fees, where do you intend to get your food?
 Once we are dependent on foreign countries for food, we will be in the same fix as we are in oil. Margaret Fletcher*

71-1

3.4.62.1 Responses to Letter 71

71-1

See Master Response 17.

3.4.63 Letter 77 (Form 2)—Ken Gregory, Gregory Farms

09/27/2010 14:15 FAX 530 662 6739 HOWARD FARMS

Comment Letter IL77

GREGORY FARMS
P.O. BOX 8716
WOODLAND, CA 95776-8716
(530) 669-1659 FAX (530) 669-1657

DATE: 9/27/10

FAX COVER SHEET

TO: Megan Smith

PHONE: _____

FAX: 916-456-6724

RE: Long Term Irrigated Lands Program

PAGES SENT (INCLUDING COVER): 3

MEMO:

Please see following comments regarding
the proposals for the Long Term Irrigated Lands
Program. We as farmers are being regulated
out of business! The estimated costs to administer
this program adds yet another financial burden
on the backs of small farmers, who can least
afford it. Please consider these comments as
you evaluate this Program. Thank you.

77-1

09/27/2010 14:19 FAX 530 662 6739 HOWARD FARMS 002

GREGORY FARMS
P.O. BOX 8716
WOODLAND, CA 95776-8716
(530) 669-1659 FAX (530) 669-1657

September 2010

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

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09/27/2010 14:19 FAX 530 662 6739 HOWARD FARMS 003


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Sincerely,


Signature

Printed Name Ken Gregory
Address P.O. Box 8716
Woodland, CA 95776

3.4.63.1 Responses to Letter 77

77-1

See Master Response 17.

3.4.64 Letter 75 (Form 2)—Daniel Hrdy

Comment Letter IL75

SEP 20 2010

September 2010

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

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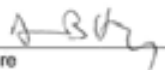
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- Who exactly "certifies" a management plan? Does such a plan have to be submitted to the Regional Board? How do we address "proprietary" or confidential business information?
- Additional information is needed regarding the possibility of 8 to 12 orders. How will multiple orders work with the existing coalition structure? Will new coalitions be formed?

I have real concerns about the program and how it will affect my business.

Sincerely,


Signature _____

Printed Name DANIEL B. HARDY
Address DANIEL B. HARDY
21440 ROAD 87
WINTERS, CA 95694

The regulatory burden in this state
is getting out of hand. Large
costs for small (if any) benefits

75-1

3.4.64.1 Responses to Letter 75

75-1

See Master Response 17.

3.4.65 Letter 74 (Form 2)—Warren E. Johnston

9/18/10
Comment Letter IL74

This program is working effectively -
Please do not make life more difficult
for farmers and small land holders -

74-1

September 2010

Warren Johnston

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

RE: Comments on Proposal for Long-Term Irrigated Lands Program

I am very concerned about the proposed Long-Term Irrigated Lands Program. I have the following concerns:

Agricultural Impacts

- What are the potential impacts to agricultural lands and potential loss of farmland due to increased regulatory costs? (Will lands be taken out of production due to high economic costs to comply with the requirements?)

Economics and Cost

- Adequacy and appropriateness of the economic analysis to your region. (As a general matter, there are numerous inaccuracies in the economic analysis that sway the economic results.
- Economic impacts and costs to comply for individuals and coalitions—Reasonable? Realistic? Feasible to continue farming?

Surface Water (Issues relating to the Recommended Program Alternative)

- Priority surface water bodies are defined as those water bodies or tributaries with aquatic life, drinking water, and human consumption beneficial uses or tributary streams with identified municipal or domestic drinking water intakes. The use of the tributary rule to determine which surface water bodies are considered priority may potentially expand the number of water bodies beyond what should be a priority (see Appendix A, p. 159).

Groundwater Quality (Issues relating to the Recommended Program Alternative)

- Which groundwater aquifers are considered high priority? Has data been collected and analyzed from local and regional groundwater monitoring programs? If not, when will this be done?

Groundwater

- Possible areas of duplicity with existing monitoring efforts if the LT-ILRP adds a groundwater monitoring element, especially if it does not utilize existing local groundwater quality programs such as SB 1938, and Integrated Regional Management Plans.
- How will existing local groundwater monitoring programs be used for obtaining groundwater quality information?
- What is the definition of “discharges to groundwater?” Concerns with point of discharge and first encounter of groundwater since there are areas where first encountered groundwater is currently not nor historically been usable for drinking water or agricultural use.
- The PEIR indicates that all ag operations can affect groundwater (ie: the mere act of irrigating a crop is considered a discharge to groundwater that causes degradation). This places the burden to prove no impact on the grower (grower has to prove way out of being regulated). What science or data was used to determine that all agricultural operations negatively affect groundwater? Were geographic areas concerned? Depth of groundwater? Use of drip or controlled irrigation?

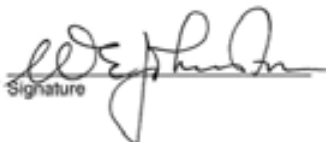
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- Additional information is needed regarding groundwater monitoring requirements. Are existing wells sufficient or is there an expectation that additional monitoring wells will be required?

General

- Additional information is needed regarding the statements that allow for periodic review of surface and groundwater plans by third parties and "interested parties" (see Appendix A, pp. 154-155). What role will the public now have?
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- Additional information is needed regarding the possibility of 8 to 12 orders. How will multiple orders work with the existing coalition structure? Will new coalitions be formed?

I have real concerns about the program and how it will affect my business.

Sincerely,


Signature

Printed Name Warren E. Johnston
 Address 600 Fillmore St.
Davis CA 95616



3.4.65.1 Responses to Letter 74

74-1

The support for Alternative 1, or continuation of the current program, will be considered in the development of the Long-term ILRP.

3.4.66 Letter 131 (Form 2)—S. Y. Monckton, Cattail Farms, Inc.

Comment Letter IL131

September 2010

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

RE: Comments on Proposal for Long-Term Irrigated Lands Program

I am very concerned about the proposed Long-Term Irrigated Lands Program. I have the following concerns:

Agricultural Impacts

- What are the potential impacts to agricultural lands and potential loss of farmland due to increased regulatory costs? (Will lands be taken out of production due to high economic costs to comply with the requirements?)

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General

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- Additional information is needed regarding the possibility of 8 to 12 orders. How will multiple orders work with the existing coalition structure? Will new coalitions be formed?

I have real concerns about the program and how it will affect my business.

Sincerely,



 Signature

CATTAIL FARMS, INC.

Printed Name S.Y. MONCKTON CO.
 PO BOX 1035
 Address KNIGHTS LANDING, CA 95645

I have closed 5- fine businesses
 and laid off a dozen employees.
 Next year I do not intend to farm
 at all due to extreme regulation.
 S.Y. Monckton

131-1

3.4.66.1 Responses to Letter 131

131-1

See Comment Letter 68, Response 1.

3.4.67 Letter 69 (Form 2)—Brian Paddock

Comment Letter IL69

September 2010

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

RE: Comments on Proposal for Long-Term Irrigated Lands Program

I am very concerned about the proposed Long-Term Irrigated Lands Program. I have the following concerns:

Agricultural Impacts

- What are the potential impacts to agricultural lands and potential loss of farmland due to increased regulatory costs? (Will lands be taken out of production due to high economic costs to comply with the requirements?)

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- Adequacy and appropriateness of the economic analysis to your region. (As a general matter, there are numerous inaccuracies in the economic analysis that sway the economic results.
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Surface Water (Issues relating to the Recommended Program Alternative)

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- Additional information is needed regarding the possibility of 8 to 12 orders. How will multiple orders work with the existing coalition structure? Will new coalitions be formed?

I have real concerns about the program and how it will affect my business.

Sincerely,

Brian Padlock
Signature

Small organic farm
Owner/operator

Printed Name Brian Padlock
Address 24155 County Rd 22
Esposito CA 95627

The perception I have of the proposed regulations are regulations disproportionate to the magnitude of the "problem", Too much government intervention.

69-1

— Brian

3.4.67.1 Responses to Letter 69

69-1

See Comment Letter 56, Response 1.

3.4.68 Letter 133 (Form 2)—Sarah W. Smith, Manager, Sewmawpaw Woodland, LLC

Comment Letter IL133

September 2010

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

RE: Comments on Proposal for Long-Term Irrigated Lands Program

I am very concerned about the proposed Long-Term Irrigated Lands Program. I have the following concerns:

Agricultural impacts

- What are the potential impacts to agricultural lands and potential loss of farmland due to increased regulatory costs? (Will lands be taken out of production due to high economic costs to comply with the requirements?)

Economics and Cost

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Groundwater Quality (Issues relating to the Recommended Program Alternative)

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- Additional information is needed regarding the possibility of 8 to 12 orders. How will multiple orders work with the existing coalition structure? Will new coalitions be formed?

I have real concerns about the program and how it will affect my business.

Sincerely,

Sarah W. Smith, Manager
 Signature *Sarah W. Smith* Printed Name
S&WMAWPAW Woodland, LLC Address *P.O. #10628*
Salinas, CA 93912

P.S. Have just returned from Maine, Reading mail and am perturbed about what seems to be excessive micromanagement of ground water management.

133-1

3.4.68.1 Responses to Letter 133

133-1

The proposed ILRP would address discharge of waste to groundwater. See Comment Letter 45, Response 20.

3.4.69 Letter 70 (Form 2)—Alice B. Wohlfrom, Wohlfrom Family Farms

Comment Letter IL70

September 2010

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

RE: Comments on Proposal for Long-Term Irrigated Lands Program

I am very concerned about the proposed Long-Term Irrigated Lands Program. I have the following concerns:

Agricultural Impacts

- What are the potential impacts to agricultural lands and potential loss of farmland due to increased regulatory costs? (Will lands be taken out of production due to high economic costs to comply with the requirements?)

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- Additional information is needed regarding the possibility of 8 to 12 orders. How will multiple orders work with the existing coalition structure? Will new coalitions be formed?

I have real concerns about the program and how it will affect my business.

Sincerely,

Alice B. Wohlfrom
Signature

WOHLFROM FAMILY FARMS
Printed Name ALICE B. WOHLFROM, TEE
Address 9 W. Marshall Ave.
WOODLAND CA 95695

*Would it be helpful to use the statistics of local cities that use well water and publish their reports?
The last 2 yrs that taxes on land in Williamson Act has gone up 36%?
Sahama/Colusa Canal water has doubled.
What do we do with the land after the paper shufflers get out of business?*

70-1

70-2

3.4.69.1 Responses to Letter 70

70-1

Groundwater quality data from a properly constructed well in a location representative of discharges from irrigated agriculture could be helpful.

70-2

See Master Response 17.

3.4.70 Letter 144 (Form 2)—Mary Anne Wood

Comment Letter IL144

September 2010

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

RE: Comments on Proposal for Long-Term Irrigated Lands Program

I am very concerned about the proposed Long-Term Irrigated Lands Program. I have the following concerns:

Agricultural Impacts

- What are the potential impacts to agricultural lands and potential loss of farmland due to increased regulatory costs? (Will lands be taken out of production due to high economic costs to comply with the requirements?)

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General

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- Additional information is needed regarding the possibility of 8 to 12 orders. How will multiple orders work with the existing coalition structure? Will new coalitions be formed?

I have real concerns about the program and how it will affect my business.

Sincerely,

Mary Anne Wood
Signature

Printed Name Mary Anne Wood
Address 15815 County Road 82B
Capay, CA 95607

144-1
P.S. We do not make enough money from our 16 acres of walnuts to meet yearly expense. All government does is sit around trying to figure out how they can squeeze more fees & taxes out of us, why do we work so hard, why don't we just quit since government takes ALL?

3.4.70.1 Responses to Letter 144

144-1

See Master Response 17.

3.4.71 Form Letter 3 Master—"I have serious concerns about the proposed Long Term Irrigated Lands Program," Letter 81—Thea Wiedenroth

Comment Letter IL81

Date: Sept. 21, 2010

TO: Region 5 Board Members;
RE: Long Term Irrigated Lands Recommended Program

Formmaster #1

I have serious concerns about the proposed Long Term Irrigated Lands Program:

- * This is a major expansion of the current IRLP. It will place increased regulatory financial burdens on agriculture, even though the water quality testing performed during the IRLP has shown very few water quality problems caused by ag. | 81-1
- * The estimates in the Draft PEIS to administer the program will range from approximately \$4,000,000 to \$66,000,000, depending on the alternative chosen. Over 95% of these costs would be funded by agriculture. | 81-2
- * The Economic Analysis estimated it will cost a grower \$5,000 to characterize surface and groundwater quality for low impact areas, in addition to costs for water quality testing. | 81-3
- * There are many flaws and fundamentally wrong assumptions in the Economic Analysis. Monitoring costs are underestimated and changes in the underlying assumptions will result in substantial increases in costs to agriculture. | 81-4
- * Groundwater quality in the Sacramento Valley is very good with few problems associated to agriculture. There is already extensive groundwater monitoring programs in existence. Duplicating these efforts is a waste of money. | 81-5
- * The assumption that the act of irrigating a crop is considered a discharge to groundwater that causes the degradation of groundwater is not provable or plausible in many areas of the State. | 81-6

Name: THEA WIEDENROTH

Signature: *Thea Wiedenroth*

3.4.71.1 Responses to Letter 81

81-1

See Master Responses 17 and 12.

81-2

See Master Response 17.

81-3

See Master Response 17.

81-4

See Master Response 17.

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

81-5

See Comment Letter 96, Response 6 and 11.

81-6

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

3.4.72 Letter 54 (Form 3)—Jennifer Bittner

Comment Letter IL54

Date: 9/22/10

TO: Region 5 Board Members;
RE: Long Term Irrigated Lands Recommended Program

I have serious concerns about the proposed Long Term Irrigated Lands Program:

- * This is a major expansion of the current IRLP. It will place increased regulatory financial burdens on agriculture, even though the water quality testing performed during the IRLP has shown very few water quality problems caused by ag.
- * The estimates in the Draft PEIS to administer the program will range from approximately \$4,000,000 to \$66,000,000, depending on the alternative chosen. Over 95% of these costs would be funded by agriculture.
- * The Economic Analysis estimated it will cost a grower \$5,000 to characterize surface and groundwater quality for low impact areas, in addition to costs for water quality testing.
- * There are many flaws and fundamentally wrong assumptions in the Economic Analysis. Monitoring costs are underestimated and changes in the underlying assumptions will result in substantial increases in costs to agriculture.
- * Groundwater quality in the Sacramento Valley is very good with few problems associated to agriculture. There is already extensive groundwater monitoring programs in existence. Duplicating these efforts is a waste of money.
- * The assumption that the act of irrigating a crop is considered a discharge to groundwater that causes the degradation of groundwater is not provable or plausible in many areas of the State.

Name: Jennifer Bittner (3rd generation farming family)
 Signature: [Handwritten Signature] Please help the farmer stay in business | 54-1

3.4.72.1 Responses to Letter 54

54-1

See Master Response 17.

3.4.73 Letter 139 (Form 3)—Stephen Brandenburger

Comment Letter IL139

Date: 9/28/2010

TO: Region 5 Board Members;
RE: Long Term Irrigated Lands Recommended Program

I have serious concerns about the proposed Long Term Irrigated Lands Program:

- * This is a major expansion of the current IRLP. It will place increased regulatory financial burdens on agriculture, even though the water quality testing performed during the IRLP has shown very few water quality problems caused by ag.
- * The estimates in the Draft PEIS to administer the program will range from approximately \$4,000,000 to \$66,000,000, depending on the alternative chosen. Over 95% of these costs would be funded by agriculture.
- * The Economic Analysis estimated it will cost a grower \$5,000 to characterize surface and groundwater quality for low impact areas, in addition to costs for water quality testing.
- * There are many flaws and fundamentally wrong assumptions in the Economic Analysis. Monitoring costs are underestimated and changes in the underlying assumptions will result in substantial increases in costs to agriculture.
- * Groundwater quality in the Sacramento Valley is very good with few problems associated to agriculture. There is already extensive groundwater monitoring programs in existence. Duplicating these efforts is a waste of money.
- * The assumption that the act of irrigating a crop is considered a discharge to groundwater that causes the degradation of groundwater is not provable or plausible in many areas of the State.

Name: Stephen Brandenburger

Signature: *Stephen Brandenburger*

*(Over Taxed Yolo County
landowner - no profit
in 15 years !!)*

139-1

3.4.73.1 Responses to Letter 139

139-1

See Master Response 17.

3.4.74 Letter 59 (Form 3)—Alfred Geerts

Comment Letter IL59

Date: 9-20-10

TO: Region 5 Board Members;
RE: Long Term Irrigated Lands Recommended Program

I have serious concerns about the proposed Long Term Irrigated Lands Program:

- * This is a major expansion of the current IRLP. It will place increased regulatory financial burdens on agriculture, even though the water quality testing performed during the IRLP has shown very few water quality problems caused by ag.
- * The estimates in the Draft PEIS to administer the program will range from approximately \$4,000,000 to \$66,000,000, depending on the alternative chosen. Over 95% of these costs would be funded by agriculture.
- * The Economic Analysis estimated it will cost a grower \$5,000 to characterize surface and groundwater quality for low impact areas, in addition to costs for water quality testing.
- * There are many flaws and fundamentally wrong assumptions in the Economic Analysis. Monitoring costs are underestimated and changes in the underlying assumptions will result in substantial increases in costs to agriculture.
- * Groundwater quality in the Sacramento Valley is very good with few problems associated to agriculture. There is already extensive groundwater monitoring programs in existence. Duplicating these efforts is a waste of money.
- * The assumption that the act of irrigating a crop is considered a discharge to groundwater that causes the degradation of groundwater is not provable or plausible in many areas of the State.

Name: Alfred Geerts *get off our backs*

59-1

Signature _____

3.4.74.1 Responses to Letter 59

59-1

See Master Responses 17 and 12.

3.4.75 Letter 61 (Form 3)—Andrew J. Johas

Comment Letter IL61

Date: 9-20-10


TO: Region 5 Board Members;
RE: Long Term Irrigated Lands Recommended Program

I want to a meeting on 9/10 being to get information, I want a copy of the study and present. If this is an example of government in action. I was and is regarding water of the - every - every - every

I have serious concerns about the proposed Long Term Irrigated Lands Program.

- This is a major expansion of the current IRLP. It will place increased regulatory financial burdens on agriculture, even though the water quality testing performed during the IRLP has shown very few water quality problems caused by ag.
- The estimates in the Draft PEIS to administer the program will range from approximately \$4,000,000 to \$66,000,000, depending on the alternative chosen. Over 95% of these costs would be funded by agriculture.
- The Economic Analysis estimated it will cost a grower \$5,000 to characterize surface and groundwater quality for low impact areas, in addition to costs for water quality testing.
- There are many flaws and fundamentally wrong assumptions in the Economic Analysis. Monitoring costs are underestimated and changes in the underlying assumptions will result in substantial increases in costs to agriculture.
- Groundwater quality in the Sacramento Valley is very good with few problems associated to agriculture. There is already extensive groundwater monitoring programs in existence. Duplicating these efforts is a waste of money.
- The assumption that the act of irrigating a crop is considered a discharge to groundwater that causes the degradation of groundwater is not provable or plausible in many areas of the State.

Name: Andrew J. Johas

Signature: 

More financial burdens.
Why is ag singled out when we know the loss is a significant water problem and will strike river

61-3

61-2

61-1

3.4.75.1 Responses to Letter 61

61-1

This input will be considered in the structuring of any future public meetings for the Long-term ILRP.

61-2

See Master Response 17.

61-3

The Central Valley Water Board, in pursuit of its mission to protect groundwater and surface water quality throughout the Central Valley region, enforces and implements multiple programs to ensure that water quality meets applicable state and federal standards. The Draft PEIR has been prepared specifically to address potential environmental effects of implementing a Long-term ILRP. Accordingly, the document focuses on irrigated agriculture management practices within the program area. The comment identifies “urban refuse” and “ammonia in the Sacramento River” as additional water quality concerns warranting attention. The Central Valley Water Board is aware of and actively involved in addressing issues associated with these topics under its National Pollutant Discharge Elimination System (NPDES) Wastewater Program.

In addition, the Central Valley Water Board issues WDRs for other types of land disposal (i.e., discharges of waste to land) including municipal and industrial treatment and holding ponds, treated wastewater ponds, and spreading basins. The Board’s cleanup programs address pollutants left at military bases, underground storage tank leaks, and others. Other programs under the Board’s jurisdiction address multiple surface water pollutant sources such as wastewater, storm water, abandoned mines, timber harvesting, and agricultural lands. The Board also is responsible for addressing effects on identified impaired water bodies and protecting the Delta.

3.4.76 Letter 93 (Form 3)—Roseann Lyons

Comment Letter IL93

Date: 9-20-2010

TO: Region 5 Board Members;
RE: Long Term Irrigated Lands Recommended Program

I have serious concerns about the proposed Long Term Irrigated Lands Program:

- * This is a major expansion of the current IRLP. It will place increased regulatory financial burdens on agriculture, even though the water quality testing performed during the IRLP has shown very few water quality problems caused by ag.
- * The estimates in the Draft PEIS to administer the program will range from approximately \$4,000,000 to \$66,000,000, depending on the alternative chosen. Over 95% of these costs would be funded by agriculture.
- * The Economic Analysis estimated it will cost a grower \$5,000 to characterize surface and groundwater quality for low impact areas, in addition to costs for water quality testing.
- * There are many flaws and fundamentally wrong assumptions in the Economic Analysis. Monitoring costs are underestimated and changes in the underlying assumptions will result in substantial increases in costs to agriculture.
- * Groundwater quality in the Sacramento Valley is very good with few problems associated to agriculture. There is already extensive groundwater monitoring programs in existence. Duplicating these efforts is a waste of money.
- * The assumption that the act of irrigating a crop is considered a discharge to groundwater that causes the degradation of groundwater is not provable or plausible in many areas of the State.

Name: Roseann Lyons

Signature: Roseann Lyons

93-1

PS: My County says my well has good demineralized water - so what's the problem ???

3.4.76.1 Responses to Letter 93

93-1

Comment noted.

3.4.77 Letter 55 (Form 3)—Ed J. F. Mast

Comment Letter IL55

Date: Sept 20 2010

TO: Region 5 Board Members;
RE: Long Term Irrigated Lands Recommended Program

I have serious concerns about the proposed Long Term Irrigated Lands Program:

- * This is a major expansion of the current IRLP. It will place increased regulatory financial burdens on agriculture, even though the water quality testing performed during the IRLP has shown very few water quality problems caused by ag.
- * The estimates in the Draft PEIS to administer the program will range from approximately \$4,000,000 to \$66,000,000, depending on the alternative chosen. Over 95% of these costs would be funded by agriculture.
- * The Economic Analysis estimated it will cost a grower \$6,000 to characterize surface and groundwater quality for low impact areas, in addition to costs for water quality testing.
- * There are many flaws and fundamentally wrong assumptions in the Economic Analysis. Monitoring costs are underestimated and changes in the underlying assumptions will result in substantial increases in costs to agriculture.
- * Groundwater quality in the Sacramento Valley is very good with few problems associated to agriculture. There is already extensive groundwater monitoring programs in existence. Duplicating these efforts is a waste of money.
- * The assumption that the act of irrigating a crop is considered a discharge to groundwater that causes the degradation of groundwater is not provable or plausible in many areas of the State.

Name: Ed J. F. Mast

Signature: [Handwritten Signature]

*WE HAVE AN IRRIGATION AND DRAINAGE
WELLS ON THE PREMISES FOR OVER 25 YEARS
AND NEVER HAD A PROBLEM.*

55-1

E.

3.4.77.1 Responses to Letter 55

55-1

The Central Valley Water Board acknowledges that there are many instances in which irrigated agriculture has not negatively impacted groundwater.

3.4.78 Letter 132 (Form 3)—Van Overhouse

Comment Letter IL132

132-1

Date: 4/02/10

TO: Region 5 Board Members;
RE: Long Term Irrigated Lands Recommended Program

I have serious concerns about the proposed Long Term Irrigated Lands Program:

• This is a major expansion of the current IRLP. It will place increased regulatory financial burdens on agriculture, even though the water quality testing performed during the IRLP has shown very few water quality problems caused by ag.

• The estimates in the Draft PEIS to administer the program will range from approximately \$4,000,000 to \$66,000,000, depending on the alternative chosen. Over 95% of these costs would be funded by agriculture.

• The Economic Analysis estimated it will cost a grower \$5,000 to characterize surface and groundwater quality for low impact areas, in addition to costs for water quality testing.

• There are many flaws and fundamentally wrong assumptions in the Economic Analysis. Monitoring costs are underestimated and changes in the underlying assumptions will result in substantial increases in costs to agriculture.

• Groundwater quality in the Sacramento Valley is very good with few problems associated to agriculture. There is already extensive groundwater monitoring programs in existence. Duplicating these efforts is a waste of money.

• The assumption that the act of irrigating a crop is considered a discharge to groundwater that causes the degradation of groundwater is not provable or plausible in many areas of the State.

Name: Van Overhouse

Signature: 

Our legislature through enabling legislation, have created bureaucracies such as the IRLP which are expanding without limit or control. You as well as others cannot keep piling on to an insignificant minority of farmers without finally breaking our back. If these programs are for the general population to pay not just the minority

I've had enough and at me first opportunity will vote to withhold production!

3.4.78.1 Responses to Letter 132

132-1

See Master Response 17.

3.4.79 Letter 56 (Form 3)—Virginia Plocker, H.D. Plocker Partnership

Comment Letter IL56

Date: 9-21-2010

TO: Region 5 Board Members;
RE: Long Term Irrigated Lands Recommended Program

I have serious concerns about the proposed Long Term Irrigated Lands Program:

* This is a major expansion of the current IRLP. It will place increased regulatory financial burdens on agriculture, even though the water quality testing performed during the IRLP has shown very few water quality problems caused by ag.

* The estimates in the Draft PEIS to administer the program will range from approximately \$4,000,000 to \$66,000,000, depending on the alternative chosen. Over 95% of these costs would be funded by agriculture.

* The Economic Analysis estimated it will cost a grower \$5,000 to characterize surface and groundwater quality for low impact areas, in addition to costs for water quality testing.

* There are many flaws and fundamentally wrong assumptions in the Economic Analysis. Monitoring costs are underestimated and changes in the underlying assumptions will result in substantial increases in costs to agriculture.

* Groundwater quality in the Sacramento Valley is very good with few problems associated to agriculture. There is already extensive groundwater monitoring programs in existence. Duplicating these efforts is a waste of money.

* The assumption that the act of irrigating a crop is considered a discharge to groundwater that causes the degradation of groundwater is not provable or plausible in many areas of the State.

Name: Virginia Plocker (H.D. Plocker Partnership)

Signature Virginia Plocker

There are too many regulations already!

56-1

3.4.79.1 Responses to Letter 56

56-1

As discussed in Section III.C of the Draft PEIR, Appendix A, waste discharge from irrigated agricultural operations has degraded Central Valley surface and groundwater quality. The ILRP must protect Central Valley surface and groundwater quality. The Central Valley Water Board is sensitive to the economic impacts of new regulations as it develops the Long-term ILRP. The Board has made significant efforts to meet requirements for water quality protection while considering costs (see pages 136–142).

3.4.80 Letter 53 (Form 3)—Helen C. Roberts and Stanley K. Roberts

Comment Letter IL53

Date 9-21-2010

TO: Region 5 Board Members;
RE: Long Term Irrigated Lands Recommended Program

my? - where will the good, safe food come from once these folks have driven the farmer out?

53-1

I have serious concerns about the proposed Long Term Irrigated Lands Program:

- * This is a major expansion of the current IRLP. It will place increased regulatory financial burdens on agriculture, even though the water quality testing performed during the IRLP has shown very few water quality problems caused by ag.
- * The estimates in the Draft PEIS to administer the program will range from approximately \$4,000,000 to \$66,000,000, depending on the alternative chosen. Over 95% of these costs would be funded by agriculture.
- * The Economic Analysis estimated it will cost a grower \$5,000 to characterize surface and groundwater quality for low impact areas, in addition to costs for water quality testing.
- * There are many flaws and fundamentally wrong assumptions in the Economic Analysis. Monitoring costs are underestimated and changes in the underlying assumptions will result in substantial increases in costs to agriculture.
- * Groundwater quality in the Sacramento Valley is very good with few problems associated to agriculture. There is already extensive groundwater monitoring programs in existence. Duplicating these efforts is a waste of money.
- * The assumption that the act of irrigating a crop is considered a discharge to groundwater that causes the degradation of groundwater is not provable or plausible in many areas of the State.

Name: Helen C. Roberts & Stanley K. Roberts

Signature: Helen C. Roberts Stanley Roberts
9-21-2010

3.4.80.1 Responses to Letter 53

53-1

See Master Response 17.

3.4.81 Letter 62 (Form 3)—John Studarus

Comment Letter IL62

Date: _____

TO: Region 5 Board Members;
RE: Long Term Irrigated Lands Recommended Program

I have serious concerns about the proposed Long Term Irrigated Lands Program:

- * This is a major expansion of the current IRLP. It will place increased regulatory financial burdens on agriculture, even though the water quality testing performed during the IRLP has shown very few water quality problems caused by ag.
- * The estimates in the Draft PEIS to administer the program will range from approximately \$4,000,000 to \$66,000,000, depending on the alternative chosen. Over 95% of these costs would be funded by agriculture.
- * The Economic Analysis estimated it will cost a grower \$5,000 to characterize surface and groundwater quality for low impact areas, in addition to costs for water quality testing.
- * There are many flaws and fundamentally wrong assumptions in the Economic Analysis. Monitoring costs are underestimated and changes in the underlying assumptions will result in substantial increases in costs to agriculture.
- * Groundwater quality in the Sacramento Valley is very good with few problems associated to agriculture. There is already extensive groundwater monitoring programs in existence. Duplicating these efforts is a waste of money.
- * The assumption that the act of irrigating a crop is considered a discharge to groundwater that causes the degradation of groundwater is not provable or plausible in many areas of the State.

Name: John Studarus

Signature: John Eldon Studarus

*MORE AND MORE REGULATIONS, REPORTING, AND FEES ARE PUTTING SMALL
OPERATIONS OUT (SMALL FAMILY FARMS) OUT OF BUSINESS.*

62-1

3.4.81.1 Responses to Letter 62

62-1

See Master Response 17.

3.4.82 Letter 60 (Form 3)—Robert Suffin

Comment Letter IL60

I DO NOT IRRIGATE MY PROPERTY NOR DO I RAISE ANY CROPS FOR RESALE. HOW WILL THESE REG'S AFFECT ME ⁶⁰⁻¹

Date: 9-18-2010

TO: Region 5 Board Members;
RE: Long Term Irrigated Lands Recommended Program

I have serious concerns about the proposed Long Term Irrigated Lands Program:

- * This is a major expansion of the current IRLP. It will place increased regulatory financial burdens on agriculture, even though the water quality testing performed during the IRLP has shown very few water quality problems caused by ag.
- * The estimates in the Draft PEIS to administer the program will range from approximately \$4,000,000 to \$66,000,000, depending on the alternative chosen. Over 95% of these costs would be funded by agriculture.
- * The Economic Analysis estimated it will cost a grower \$5,000 to characterize surface and groundwater quality for low impact areas, in addition to costs for water quality testing.
- * There are many flaws and fundamentally wrong assumptions in the Economic Analysis. Monitoring costs are underestimated and changes in the underlying assumptions will result in substantial increases in costs to agriculture.
- * Groundwater quality in the Sacramento Valley is very good with few problems associated to agriculture. There is already extensive groundwater monitoring programs in existence. Duplicating these efforts is a waste of money.
- * The assumption that the act of irrigating a crop is considered a discharge to groundwater that causes the degradation of groundwater is not provable or plausible in many areas of the State.

Name: ROBERT J. SUFFIN

Signature: Robert J. Suffin

3.4.82.1 Responses to Letter 60

60-1

The ILRP does not apply to nonirrigated land or to land that does not raise crops for resale. The Long-term ILRP would not apply to the operation described in this comment.

3.4.83 Letter 57 (Form 3)—Penelope Walgenbach

Comment Letter IL57

Date: 8/21/10

TO: Region 5 Board Members;
RE: Long Term Irrigated Lands Recommended Program

I have serious concerns about the proposed Long Term Irrigated Lands Program:

- * This is a major expansion of the current IRLP. It will place increased regulatory financial burdens on agriculture, even though the water quality testing performed during the IRLP has shown very few water quality problems caused by ag.
- * The estimates in the Draft PEIS to administer the program will range from approximately \$4,000,000 to \$66,000,000, depending on the alternative chosen. Over 95% of these costs would be funded by agriculture, *which cannot afford to absorb these costs.* 57-1
- * The Economic Analysis estimated it will cost a grower \$5,000 to characterize surface and groundwater quality for low impact *in* 57-2 addition to costs for water quality testing. *This is an unacceptable and unreasonable burden.*
- * There are many flaws and fundamentally wrong assumptions in the Economic Analysis. Monitoring costs are underestimated, *which cannot absorb these additional costs.* 57-3 changes in the underlying assumptions will result in substantial increases in costs to agriculture.
- * Groundwater quality in the Sacramento Valley is very good with few problems associated to agriculture. There is already extensive groundwater monitoring programs in existence. Duplicating these efforts is a waste of money, *time, and effort.* 57-4
- * The assumption that the act of irrigating a crop is considered a discharge to groundwater that causes the degradation of groundwater is not provable or plausible in many areas of the State.

Name: Penelope Walgenbach

Signature: P. Walgenbach

3.4.83.1 Responses to Letter 57

57-1

See Master Response 17.

57-2

See Master Response 17.

57-3

See Master Response 17.

57-4

See Comment Letter 114, Response 10.

3.4.84 Letter 72 (Form 3)—John W. Wilson

Comment Letter IL72

Date: 9-19-10

TO: Region 5 Board Members;
RE: Long Term Irrigated Lands Recommended Program

I have serious concerns about the proposed Long Term Irrigated Lands Program:

- * This is a major expansion of the current IRLP. It will place increased regulatory financial burdens on agriculture, even though the water quality testing performed during the IRLP has shown very few water quality problems caused by ag.
- * The estimates in the Draft PEIS to administer the program will range from approximately \$4,000,000 to \$66,000,000, depending on the alternative chosen. Over 95% of these costs would be funded by agriculture.
- * The Economic Analysis estimated it will cost a grower \$5,000 to characterize surface and groundwater quality for low impact areas, in addition to costs for water quality testing.
- * There are many flaws and fundamentally wrong assumptions in the Economic Analysis. Monitoring costs are underestimated and changes in the underlying assumptions will result in substantial increases in costs to agriculture.
- * Groundwater quality in the Sacramento Valley is very good with few problems associated to agriculture. There is already extensive groundwater monitoring programs in existence. Duplicating these efforts is a waste of money.
- * The assumption that the act of irrigating a crop is considered a discharge to groundwater that causes the degradation of groundwater is not provable or plausible in many areas of the State.

Name: John W Wilson

Signature: John W Wilson

PO Box 101
Ms Smith, Guinda CA 95637-0101

I live @ the west end of Co Rd 45,
in Yolo County (aprox 1m north of Guinda).

The aquifer is limited (maybe
4 sq miles) and one large grower,
"Full Belly", pumps heavily.

Last yr. ~~to~~ started logging well.
Last yr. 55' down to 150'
This yr. 55' " " 122' now.

Any water I pump at this time when
well is low costs twice as much.
In short rain yrs they may
completely deplete the groundwater.
You are busy but I would
like to know if there is recourse
or regulation against over use.

Thank you John Wilson
PO Box 101
Guinda CA 95637

72-1

3.4.84.1 Responses to Letter 72

72-1

See Master Response 10. The Draft PEIR did not consider use of groundwater for irrigation as a program component to be analyzed primarily because the program description and impact analysis assume that current water supply and consumption rates would stay relatively constant while only irrigation management practices would be altered through implementation of one of the alternatives. The State Water Board (not the Central Valley Water Board) has authority over water use, although regulation of groundwater pumping is limited to adjudicated groundwater basins.

3.4.85 Letter 58 (Form 3)—Alice B. Wohlfrom, Wohlfrom Family Farms

Comment Letter IL58

Date: 9/21/10

TO: Region 5 Board Members;
RE: Long Term Irrigated Lands Recommended Program

I have serious concerns about the proposed Long Term Irrigated Lands Program:

* This is a major expansion of the current IRLP. It will place increased regulatory financial burdens on agriculture, even though the water quality testing performed during the IRLP has shown very few water quality problems caused by ag.

* The estimates in the Draft PEIS to administer the program will range from approximately \$4,000,000 to \$66,000,000, depending on the alternative chosen. Over 95% of these costs would be funded by agriculture.

* The Economic Analysis estimated it will cost a grower \$5,000 to characterize surface and groundwater quality for low impact areas, in addition to costs for water quality testing. *In the last 2 yrs my property tax 160 acres has gone up 36%. Subwatershed Prog. doubled.*

* There are many flaws and fundamentally wrong assumptions in the Economic Analysis. Monitoring costs are underestimated and changes in the underlying assumptions will result in substantial increases in costs to agriculture.

* Groundwater quality in the Sacramento Valley is very good with few problems associated to agriculture. There is already extensive groundwater monitoring programs in existence. Duplicating these efforts is a waste of money.

* The assumption that the act of irrigating a crop is considered a discharge to groundwater that causes the degradation of groundwater is not provable or plausible in many areas of the State.

Name: Alice B. Wohlfrom - land owner Wohlfrom Family Farms.

Signature Alice B. Wohlfrom
Use the statistics of local cities that use well water to determine if the water is deteriorating would be helpful.

58-1

3.4.85.1 Responses to Letter 58

58-1

The quality of municipal well water would not necessarily be indicative of the quality of water in agricultural areas. See Comment Letter 104, Response 33.

