

December 20, 2017

Felicia Marcus, Chair  
State Water Resources Control Board  
1001 "I" Street  
Sacramento, California 95812-0100



**RE: "Comments to A -2239(a) -(c)." Second Staff Proposed Order Revising the Eastern San Joaquin General Order R5-2012-0116**

Dear Chair Marcus:

Upper Feather River Watershed Group is writing to once again express concern about the changes being considered to the irrigated lands program. The precedential direction by the State Water Resources Control Board fails to recognize the regional differences in California agriculture and groundwater quality conditions. The "one size fits all" approach that is in the Second Staff Proposed Order will result in disproportionate burden and cost to agricultural operations in our mountain watershed area.

In the Frequently Asked Questions (FAQ) the response to Question 5 – *How does the Proposed Order differ from the draft order released in February 2016?* -, states the Proposed Order is **intended "to minimize increased in the reporting burden for growers and the coalition."** However, it does the **exact opposite**, by requiring the **85** land owners in UFRWG low vulnerability area to 1) have the same reporting requirement, 2) complete a new and expansive Irrigation and Nitrogen Management Plan (INMP), and to certify it, and 3) complete a newly created form, the Management Practices Implementation Report (MPIR). The new proposal

As the State Water Board recognizes in the Proposed Order (Page 2), a vast majority of landowners plan for the long term, and are "naturally motivated to protect natural resources, through the stewardship of the land." This extends to water quality as well.

In the **Upper Feather River Watershed** the surface water quality results since 2005 have shown no exceedances of water quality objectives for many registered pesticides and no toxicity. Yet the Second Proposed Order is recommending the establishment of a Surface Water Expert Panel. We oppose that.

The Proposed Order acknowledges on Page 25, **"the expanded reporting obligations will result in increased costs to the growers in low vulnerability areas."** If what is being proposed in the Second Proposed Order yielded meaningful results the phasing in of the expanded reporting obligations **might** be understandable. What is being proposed will threaten the third-party Coalition approach that the Second Proposed Order recommends be implemented in other regions of California. **This is a clear and wasteful step backward in the science based efforts of upper watersheds, working with UC Cooperative Extension and UC Rangeland Watershed Laboratory, to advocate and encourage better defined subwatershed regional and commodity specific modifications for low threat agriculture like irrigated pasture in the upper watersheds.**

The State Water Board's reliance on the recommendations of the Agricultural Expert Panel (Expert Panel) formed by the California Department of Food and Agriculture (CDFA) is understandable given the knowledge of groundwater quality at the time. However, in 2016 *High Resolution Mapping the Central Valley* was completed as a foundational element of the Central Valley Salinity Alternatives for Long-Term

Sustainability (CV-SALTS) Basin Plan Amendment to manage nitrates and salts. Additionally, Dr. Thomas Harter, Chair of Water Management and Policy, UC Davis Department of Land, Air, and Water Resources, recently completed a long-term assessment of past and current potential loading to groundwater on irrigated and natural lands across the entire Central Valley of California using a nitrogen mass balance approach.

The results of both these technical studies show the Sacramento Valley, with limited exception, has excellent groundwater quality and will so for decades to come. Localize impacts from nitrate on groundwater quality and naturally occurring sources of groundwater salinity may require additional management actions, but the long term ambient groundwater quality is projected to remain well above any levels of impairment. The Second Proposed Order fails to recognize or account for this. It should.

The past eleven years of water monitoring, special local studies, UC science and NRCS assisted project implementations has provided plenty of data to support program recognition of the high water quality and low threat of the seasonal irrigated pasture and hay forage operations in our upper watersheds.

**We urge you to take time to recognize these accomplishments in developing current and future program modifications by crafting and including low threat pasture and forage crop options as well as low vulnerability area options. Please do not rush through a one-size-fits-all Order that ultimately punishes the good stewardship efforts and progress of our dedicated UFRWG members over the past eleven years.**

Respectfully,

Russell Reid, Chairman  
Upper Feather River Watershed Group

Cc: Vice-Chair Steven Moore      Tam M. Doduc      Dorene D'Adamo  
E. Joaquin Esquivel

Darrin Pohlemus      Emel Wadhvani

Dr. Karl Longely, Chair, Central Valley Regional Water Quality Control Board  
Pamela Creedon      Adam Laputz      Sue McConnell