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5/30/2016

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



RE: "Comments to A-2239(a)-(c)" – State Water Board Review of WDRs General Order [No. R5-2012-0116] for Growers within the Eastern San Joaquin River Watershed that Are Members of the Third-Party Group (the Eastern San Joaquin Water Quality Coalition)

Ms. Townsend and State Water Board Members:

Phoenix Orchard Group I, LP, Phoenix Orchard Group II, LP and Phoenix Orchard Group IV, LP are the owners and operators of 530 acres of citrus/mandarin varieties of farms in Fresno Counties, California. We are premier farm owners/operators who conduct our business and achieve our goals of being good stewards of the land, provide an agrarian way of life and employment opportunities for our community, and providing a healthy, quality and consistent piece of fruit to our United States and foreign export markets.

I am writing to **strongly express my objection** to the State Water Board, considering the proposed changes to the General Order. We have ranches in the Kings River Watershed Coalition. I understand that these changes may be precedent setting and will, if approved, significantly change and increase costs of the Central Valley Irrigated Lands Regulatory Program.

We are all on the same side sharing the **desire to clean up our drinking water**. That being said, these proposed changes will **do nothing to further that effort**. The expanded reporting would only put a **bullseye on the backs of the hard working people** that have supported our country and our food supply since the creation of country.

We've all read the Harter Report prepared by UC Davis, which advocates that fertilizer from California agriculture is a large proponent of the nitrates currently in our drinking water. However, this report fails to indicate the history or time frame of these problems. The rule of thumb taught in agriculture classes

everywhere is that it takes 1 foot of water to push salts (such as nitrates) a foot deeper into the soil. With only 2.5 – 3 feet of water applied each year, it has taken 25-50 years for the nitrates currently being measured to reach the water table. Farming has drastically changed in the past 50 years. With the way costs have changed, inefficient farming is no longer an option. Every aspect of our farming is closely monitored to reduce inputs. We hire a third party consultant to work with our employees to monitor irrigation cycles, insuring each drop of water is used for the benefits of the plants. Flood irrigation is a thing of the past, as now we have microirrigation and drip systems that are designed to match the demands of our plants. Several times a year we take soil and leaf tissue samples, and customize our fertilizer blends. **We don't waste resources, because we can't afford to do so.**

I specifically object to the following changes:

- **Expansion of reporting to include having to provide to the state, for deposit into a public website, field-level data and location information regarding my farming operation.**

Farming is complex, and our fields vary drastically from location to location, depending on crop, variety, fruit set, weather, humidity, pest pressure, and a number of other factors. Publishing sensitive and proprietary farming data into public record would neglect the differences between our fields and create a hit list of farmers all over the state. It takes significantly more nitrogen to grow a mandarin to the proper size and quality than an orange, but our ranches would be open to lawsuits by someone who may observe that our field applied more fertilizer than a neighbor. Several studies have shown that the nitrogen in our groundwater comes from land several miles away, not just underneath us. It is to be a group effort to clean up the water supply. Field-level reporting will do nothing to help, but will only create lawsuits for those of us who attempt to comply.

- **Requiring growers to sample all domestic wells on lands covered by the ILRP, reporting results to growers and on a public website.**

This is a separate issue, outside the scope of the irrigated lands program. The additional costs would make the program infeasible, and only further to eliminate grower support.

- **The addition of irrigation tracking to the ILRP program, and reporting results on a public website.**

The recent drought in California has brought farming irrigation into the public eye in an unprecedented way. Beyond the changes forced by economic demands, there are also several legislative efforts that will also force the tracking and reduction of irrigation water. One of these programs is the Sustainable Groundwater Management Act (SGMA), which is set to be implemented over the next few years. By adding irrigation tracking to the ILRP, this will only duplicate both the required work and costs.

It took thousands of hours to create the current General Order, and we have just begun the implementations phase. The costs of the administration and implementation have been significantly higher than were estimated, but farmers are trying to comply and work with our coalitions to protect our groundwater. These additional changes would only undermine the original report, our coalitions, and our efforts to date. I ask that you allow the current program to continue, and receive results, rather than these rushed and drastic changes, that will have severe and unintended consequences.

Thank you for your time.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger L. Stevenson", with a long horizontal flourish extending to the right.

Roger L. Stevenson
President
Cotton Norton Stevenson Consulting, Inc.
General Partner

Phoenix Orchard Group I, LP
Phoenix Orchard Group II, LP
Phoenix Orchard Group IV, LP