



TMDL

TOTAL MAXIMUM DAILY LOAD
Voluntary Compliance Program

September 5, 2013

Mr. Robert Perdue
Executive Director
California Regional Water Quality Control Board
Colorado River Basin
73-720 Fred Waring Drive, Suite 100
Palm Desert, CA 92260

Re: Resolution R7-2013-0070: Imperial County Farm Bureau TMDL Compliance Program to Correct Impairments of Chlorpyrifos and Diazinon in the Alamo and New Rivers

Dear Mr. Perdue:

Imperial County Farm Bureau (ICFB) appreciates the opportunity to comment on the Regional Water Quality Control Board's (RWQCB) resolution to address impairments of Chlorpyrifos and Diazinon in the New and Alamo Rivers.

ICFB has worked diligently since 2000 to establish a positive relationship with Imperial Valley farmers and ranchers to address silt and sedimentation levels in the New and Alamo Rivers. Our ICFB Voluntary TMDL Compliance Program is award winning and has been most successful in reaching the goals on the rivers as established by the RWQCB.

The current proposal, as set forth in Resolution R7-2013-0070, requires ICFB to address and correct impairments of Chlorpyrifos and Diazinon in the New and Alamo Rivers. Although a plan has been established to address both impairments, we question if it is necessary to include a regional monitoring plan of Diazinon in your requirements.

The use of Diazinon has significantly diminished in recent years. Cropping patterns, the change of insect dynamics and significant revisions to the label has allowed growers to reduce the amount of Diazinon used on their agricultural crops. The Imperial County Agricultural Commissioner's Office (ICACO) reports that in 1997 farmers used a total 53,941 pounds as compared to 2012 reporting a total use of 511 gallons which equates to approximately 2,000 pounds. To further expand, according to documents, only 13 different permit holders were

responsible for the application of the total Diazinon applied in 2012. This represents less than 3% of the farmers in Imperial County.

Considering the minimal use of Diazinon, and limited supplies of the chemical, it seems unreasonable to place restrictions by regulating all farmers throughout the region for the activity of only a few. As referenced in monitoring data provided by the RWQCB, the occasions Diazinon levels were elevated above the State of California standards have consistently been during the mid-October / early November time period. This timing correlates with the planting of carrots and dehydrated onions in the Imperial Valley. Comparing the locations and times of these elevated levels with application records provided by ICACO, we are able to identify specific farming operations of concern.

Since early 2000, the ICFB TMDL staff has successfully worked with farmers to reduce the silt and sedimentation leaving their fields by consulting them on the installation of new management practices and modifying irrigation practices to prevent further exceedances. A similar approach is used by the coalitions in the Central Valley and could easily be integrated into our current program.

Therefore, ICFB respectfully requests the RWQCB to consider a more effective approach of allowing ICFB staff to provide technical assistance and training to those few individuals that have recorded use of Diazinon in specific areas of concern in 2012. By consulting with these farmers on best management practices to address the impairment, a significant reduction in the levels will be found in the New and Alamo Rivers.

Furthermore, we recommend that monitoring activity be focused on those specific monitoring sites along the river with historical higher levels of Diazinon rather than expending unnecessary resources to monitor the entire river. In addition, further clarification is requested in identifying who will act as the lead agency to fulfill the monitoring requirement to verify results on the New and Alamo Rivers.

We appreciate your consideration of our request and are available to answer any questions you may have.



Linsey J. Dale
Executive Director
Imperial County Farm Bureau

cc: Jose Angel, Regional Water Quality Control Board – Colorado River Basin
Nadim Zeywar, Regional Water Quality Control Board – Colorado River Basin
Steve Charlton, Imperial Irrigation District