

March 21, 2011

Kate Hart, Chair
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670

RE: Comments on Irrigated Lands Regulatory Program Framework

NO deal on individual farm evaluations!

Dear Chairperson Hart,

I live in the Grass Valley area and have been involved with this regulatory program since 2003 and have rarely seen much in the program that even was appropriate for foothill locations and irrigated pastures. After working with the Regional Board ILRP staff for the past few years, this new long term program seems to address these "low threat" areas where water quality is good and agricultural practices do not seem to affect water quality. I have always preferred.

I have great issue under this new proposed program that **requires individual farm evaluations** in the different tiers. Tier 1 should allow irrigated pastures and pretty much all of the foothill agricultural practices to continue their good work and not ask them to do more, especially when it is not warranted. We have prided ourselves in high quality educational programs to our growers and ranchers through the Farm Bureau and Placer/Nevada/South Sutter/ North Sacramento sub-watershed coalition under Sacramento Valley. We strongly believe that this proactive approach achieves much greater results of landowners implementing Best Management Practices and comes from a trusted source with these private landowners. Asking private landowners to report directly to the Regional Board is ludicrous in time, effort and certainly will not achieve any better results that we currently have. In fact, I would estimate that landowners will finally "throw in the towel" trying to understand this program and why they are even in it. Also, how in the world would you even staff the regional Board staff to accommodate landowners reporting directly to you. That is going to increase the cost to an even more ridiculous amount of money being spent on this program.

New coalitions will form as a result of the Tier 1 Low Threat and the Regional Board staff and ILRP should let these groups continue to communicate and work with their fellow growers and ranchers in a productive way that continues to result in clean water! By requiring individual farm reporting, you will destroy the current small, local coalitions that lead the growers and work effectively with them. In addition, landowners do not want to deal with a regulatory body such as the Regional Water Quality Control Board nor report private information to you. I believe this might result in landowners stopping good practices because they continue to be punished for doing good land stewardship.

Finally, this is a great hardship for our rural landowners who don't even have internet service. Over 50% of our members do NOT have any access to submit data electronic data. Is the State of California going to provide a new service to all these rural landowners so they can abide by this new proposa. Please do not require this.l

Please eliminate the individual farm reporting because it won't work, it won't achieve any better results, will most likely have a negative effect on participants/ program and will be VERY COSTLY.

We have been doing great things and achieving great results, stop further regulations that don't make sense. If you have any questions, I can be reached at [REDACTED]

Lesa Osterholm

[REDACTED]

cc. Joe Karkowski

Adam Laputz

Susan Friegan

PNSSNS