



UNIVERSITY OF CALIFORNIA COOPERATIVE EXTENSION

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1 April 2011

To: Adam Laputz, Joe Karkoski and
Central Valley Regional Water Quality Control Board

From: Holly George, 
County Director and Livestock/Natural Resources Advisor

RE: Recommended Irrigated Lands Regulatory Program Framework, Staff Report, March 2011

I am most familiar with this program in the Upper Feather River Watershed where I where I have worked for the University and with the agricultural community since 1987. In collaboration with Dr. Ken Tate and others from UC Davis I was PI for a Prop 50 funded project that monitored ambient water quality above and below major irrigated valleys across the watershed as well as some on-ranch monitoring from 2005-2008 in addition to conducting a number of special studies and significant outreach to producers in conjunction with the Upper Feather River Watershed Group. Our data and that collected by the local watershed group subsequently shows that the type of irrigated agriculture locally is a 'low threat'.

I think it is great that the Regional Board has incorporated a Tiered approach within the ILRP to deal with different levels of 'threat' to water quality from the array of agricultural operations across the region.

On page 12, you state that you've made changes to improve the draft *by reducing expectations and requirements for areas with no known water quality issues. Regulatory coverage is still needed, but we want to minimize resources dedicated to areas where water quality issues are unlikely...* I believe data collected since this program started supports that the Upper Feather River Watershed meets this category. The goals and objectives identified on page A-2 talk about *maintaining the economic viability of agriculture in the Central Valley and encouraging implementation of management practices that improve water quality without jeopardizing the economic viability for all sizes of irrigated agricultural operations or placing an undue burden on rural communities to provide safe drinking water* sound fine.

Yet there appear to be some inconsistencies when on pg 5 under Farm plans, it says *the Board staff believes that a reasonable and minimal step for a grower to take is to conduct a farm evaluation, which can be accomplished in a cost-effective manner and retained onsite...Staff do not believe that the benefits of preparing comprehensive certified farm management plans, other than for nutrients in Tier 3 groundwater areas, are justified by the costs---unless regional plans have not been adequately implemented* (not exactly sure what the last part of this statement means...and to what level??) But then on page A-14 you state *...the Board intends to maximize the use of electronic data submittals from individual dischargers to the Board...I do not think this is necessary nor in keeping with the goals, objectives and previous acknowledgements about maintaining viability and minimizing resources dedicated to areas where water quality issues are unlikely.* I would strongly urge you to remove this requirement especially in areas that meet Tier 1-2 requirements. Let sub-watersheds summarize the data.

I question the appropriateness of including specific practices for conditional waivers in the Framework ,



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liked irrigated pasture and certified organic farmers (page A-9)...specifics should be drafted in the sub-regional plans and orders developed in conjunction with RB staff, third parties. Thank you again for incorporating the Tiered program. **Please maintain flexibility, common sense and economic reality.**