

**Smith, Megan**

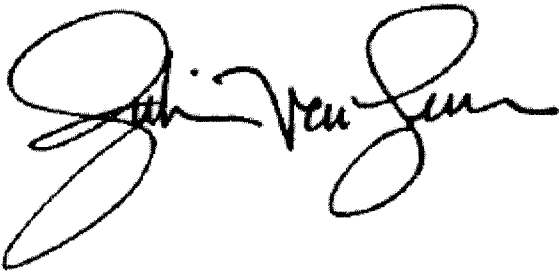
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**From:** julianne.vanleeuwen@edcgov.us  
**Sent:** Friday, 24 September 2010 15:38  
**To:** ILRP Comments  
**Cc:** tracey.eden-bishop@edcgov.us; gerri.silva@edcgov.us; myrna.tow@edcgov.us  
**Subject:** ILRP Comment Letter - EDC Water Agency  
**Attachments:** ATT00001.gif; ILRPComment Letter Jack\_Sweeney.pdf

Ms. Smith:

The El Dorado County Water Agency is pleased to submit the following comment letter on the Draft PEIR for a Waste Discharge Regulatory Program for Irrigated Lands within the Central Valley Region.

Thank you.

A handwritten signature in black ink, appearing to read "Julianne van Leeuwen". The signature is fluid and cursive, with the first name being the most prominent.

Julianne van Leeuwen, Deputy Clerk  
El Dorado County Water Agency  
3932 Ponderosa Road, Suite 200  
Shingle Springs, CA 95682  
530/621-5392

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## El Dorado County Water Agency

Ron Briggs  
*Board of Supervisors*

John P. Fraser  
*El Dorado Irrigation District*

James R. Jones  
*South Tahoe P.U.D.*

Norma Santiago  
*Board of Supervisors*

James R. "Jack" Sweeney  
*Board of Supervisors*

September 24, 2010

Central Valley Regional Water Quality Control Board  
Irrigated Lands regulatory Program  
Ms. Megan Smith  
630 K Street, Suite 400  
Sacramento, CA 95814

Subject: Comments on the Irrigated Lands Regulatory Program- Program  
Environmental Impact Report

Dear Ms. Smith:

The El Dorado County Water Agency has reviewed the Program Environmental Impact Report (PIER) for the Irrigated Lands Regulatory Program (ILRP). The proposed ILRP will involve the adoption of one or more general Waste Discharge Requirements (WDRs), Conditional Waivers of WDRs, and Prohibitions of Discharge to regulate the discharge of waste to ground waters of the State from irrigated agricultural operations, managed wetlands and nursery operations. The stated objectives of the ILRP are to: 1) restore and/or maintain the highest reasonable quality of state waters considering all the demands being placed on the water; (2) minimize waste discharge from irrigated agricultural lands that could degrade the quality of state waters; (3) maintain the economic viability of agriculture in California's Central Valley; and (4) ensure that irrigated agricultural discharges do not impair access by Central Valley communities and residents to safe and reliable drinking water.

The El Dorado County Water Agency is a County-wide planning agency with responsibility for ensuring adequate water supplies for the residents of El Dorado County, including surface and ground water quality. As such, EDCWA offers the following comments. It is important first, to preface the comments with a summary of the character of agriculture, existing water quality and ground water geology in El Dorado County.

### **Agriculture in El Dorado County**

Irrigated agricultural operations in El Dorado County are typically patchwork, low intensity, small family owned and operated farms with an average parcels sizes of 38 acres that include an irrigated agricultural production area of 10 acres. Agricultural operations are limited to small geographic area in the County, due to elevation, poor soils, topography and limited water availability. While high volume sprinklers are used, primarily for frost protection, a majority of irrigation is done with more efficient micro-sprinklers or drip systems. The primary commercial

commodities are permanent crops consisting of fruit and nut orchard, wine grapes, Christmas trees, berries with a few vegetables and a small amount of irrigated pasture.

### **Water Quality**

Local water districts, Sacramento Municipal Utility District and Low Threat Waiver surface water quality testing done in the South Fork American and Cosumnes River watersheds, show excellent water quality with no evidence of any adverse effects resulting from agricultural operations within the County.

As a result of low intensity farming, irrigation practices and excellent water quality, El Dorado County watersheds, through the El Dorado County Agricultural Water Quality Management Corporation, have been approved for a management practices-based Pilot Program that eliminates surface water monitoring for two years.

### **Groundwater Geology**

Based on the Department of Water Resources Bulletin 118, California Groundwater Basins and Sub-basins Map, El Dorado County west of the Sierra Nevada crest does not contain a groundwater basin or subbasin. Water Code Division 6, Chapter 1, Part 2.11, Section 10921 also recognizes the absence of significant ground water on the western slope, by exempting areas not designated as having a groundwater basins or sub-basin from investigative monitoring of groundwater elevations.

A large portion of El Dorado County and virtually all irrigated lands within the County are located on the western slope of the Sierra Nevada. Unlike the Central Valley, groundwater in these areas is found in fractured hard rock, generally to depths over 200 feet. Fractures may be large or small and may run up and down or sideways. They may be a few millimeters to hundreds of meters long, but most are less than a millimeter wide (DWR Water Facts, Number 1). The varied orientation and interconnectivity, or lack thereof, of these fractures make it virtually impossible to identify the source or the destination of the water. Wells in the hard rock of El Dorado County are generally low producing and are used for individual residences and/or small farming activities. In Table 5.9 of the PEIR, the County of El Dorado is not recognized as having any pesticides detected in wells from 1985-2003, indicating that agricultural operations are not likely to be affecting the deep domestic wells typical of the western slope.

Groundwater sufficient to supply public water systems is unavailable, and the few groundwater supplies that have been used for municipal purposes, on the western slope, have been abandoned. Public water agencies on the western slope therefore, deliver only surface water to their customers.

### **Comments**

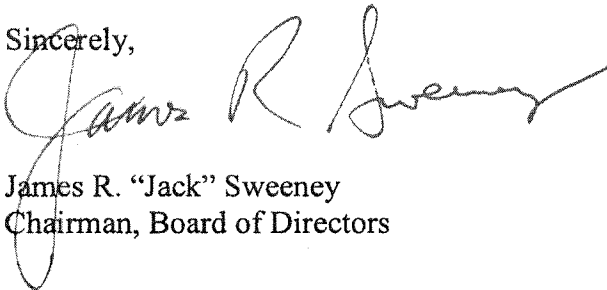
The draft PEIR analyzes the environmental impacts of five program alternatives and a proposed staff recommendation for a long term plan to best meet the applicable statutory requirements and the goals and objectives of the Irrigated Land Regulatory Program (ILRP). Each alternative has its individual merits, but the alternatives are not flexible enough for the non-water basin areas of the Central Valley, such as El Dorado County, where the objectives of the ILRP are already being met. Water quality is excellent in El Dorado County and there is no evidence that

agricultural operations are contributing to surface or groundwater degradation. Irrigation practices, low intensity farming and mixed land uses minimize discharges that could degrade water quality. There is no evidence of impairment of drinking water supplies. For these reasons the EDCWA requests that the Board consider a tiered approach similar to other State Water Board Regulations with the least regulated tier applying to those agriculture lands that are not in a recognized water basin or sub-basin. In conjunction with this tiered methodology an approved management practice program would be required and existing groundwater data reviewed and assessed to verify the objectives of the ILRP are being achieved.

Based on the information provided, it appears that the County of El Dorado County irrigated lands should not be required to conduct groundwater monitoring and should be placed in a least regulated tier as discussed above. It is the intent of the El Dorado County Water Agency to support and work with the El Dorado County Agricultural Water Quality Management Corporation and the El Dorado County Environmental Health department in the development of a compliance work plan. We support the El Dorado County Agricultural Water Quality Management Corporation irrigated land coalition in their action to comply with the Pilot Watershed Management Practices Plan and support their desire to achieve a reasonable and logical management practices plan for the irrigated lands of the County of El Dorado.

Thank you for your time and consideration of the El Dorado County Water Agency's comments on the Draft Program Environmental Impact Report.

Sincerely,

A handwritten signature in black ink, appearing to read "James R. Sweeney". The signature is written in a cursive style with a large initial "J" and "S".

James R. "Jack" Sweeney  
Chairman, Board of Directors

TEB

Cc: El Dorado County Environmental Management  
El Dorado County Agricultural Water Quality Management Corporation