

From: Chris Valadez [CValadez@cgtfll.com]
Sent: Monday, September 27, 2010 2:27 PM
To: ILRP Comments
Subject: ILRP Draft PEIR; Comment Letter
Attachments: ILRP DraftEIR-Comment-Sept 2010.pdf

To Whom It May Concern:

Please see the attached letter from the California Grape & Tree Fruit League. If you have questions related to the letter please contact Christopher Valadez by email (cvaladez@cgtfll.com) or at the League office (559-226-6330).

Regards,

Christopher Valadez
California Grape & Tree Fruit League



CALIFORNIA
GRAPE & TREE FRUIT
LEAGUE

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September 27, 2010

Via Email: ILRPcomments@icfi.com

ILRP Comments
Ms. Megan Smith
630 K Street, Suite 400
Sacramento, CA 95814

Re: Draft Programmatic Environmental Impact Report (PEIR) and Economics Report
For the Long-Term Irrigated Lands Regulatory Program

Dear Ms. Smith:

The California Grape & Tree League (League) is a non-profit public policy association representing the state's fresh grape, deciduous tree fruit, and berry communities. The League's grower/shipper membership reflects over 85 percent of the respective fresh commodities which are grown, packed, and shipped by multi-generational family farms vital to California's economy and fresh fruit supply.

The process of developing a long-term Irrigated Lands Regulatory Program was met with concern as Central Valley Regional Water Quality Control Board (CVRWQCB) staff set an end goal of creating a new program which includes the monitoring and regulation of groundwater for quality, marking a change from the present IRLP surface water regulatory program. Throughout the stakeholder process we shared concerns regarding the new shape of the regulatory program, cost of the implementation of new program, including program fee increases to support CVRWQCB staff needed to execute program enforcement. The draft Environmental Impact Report assessment of the five identified alternatives re-emphasizes the scope of the stakeholder process, in identifying alternatives, while introducing a preferred alternative upon concluding debate and analysis of the previously identified potential program changes. We anticipated the release of the preferred alternative in order to review program details, assess cost of implementation and applicability to farming conditions in the fresh grape, deciduous tree fruit and berry sectors; and with the release we believe the economic impact analysis requires additional review. Costs of adding monitoring requirements, drilling new monitoring wells, and/or changing or amending an irrigation system are costs not fully addressed in the current economic analysis.

Fundamentally, there remains the presumption that all irrigated lands drain to groundwater. We continue to ask CVRWQCB staff to support the rationale that all irrigated lands drain to groundwater. For agricultural operations employing drip irrigation it would be assumed that irrigation applied is discharged to groundwater. We recognize the interest to input a long-term program but believe further analysis is needed to present sound data supporting the presumption of discharge before instituting a new program certain to add costs to irrigated agricultural operations.

Sincerely,

A handwritten signature in black ink, reading "Christopher Valadez". The signature is written in a cursive style with a large, sweeping initial "C".

Christopher Valadez
Director of Environmental
& Regulatory Affairs