



FARM BUREAU SAN DIEGO COUNTY

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February 12, 2015

Mr. Fisayo Osibodu
San Diego Regional Water Quality Control Board
2375 Northside Drive, Suite 100
San Diego, CA 92108-2700

Re: Basin Plan Amendment Resolution No. R9-2015-0008, Nitrate Objective for Groundwater

Dear Mr. Osibodu:

The San Diego County Farm Bureau appreciates this opportunity to comment. Our organization represents the producers who irrigate crops in Region 9 and would be directly affected by the content of the proposed Basin Plan Amendment to change the nitrate water quality objective for ground waters.

Chapter 4, Implementation, discusses discharges to ground water from agricultural and nursery operations at page 4-9. This section references the Agricultural Expert Panel (Panel) convened by the State Water Board. This section goes on to discuss the work done by the Panel. It is our understanding that while the Panel did submit a report of recommendations; those recommendations were not adopted by the State Water Board and are currently under consideration. The State Water Board has stated that it will, in the near future, convene a public participatory process to review the recommendations before possible adoption. It would be our suggestion to delete any reference to the Panel's recommendations until the State Water Board completes its work, otherwise the San Diego Regional Water Quality Control Board may be out of step with the State Water Board.

That section also includes the statement, "WDRs for agricultural and nursery operations in the San Diego Region should require dischargers to implement appropriate management measures to ensure that their operations do not adversely affect ground water or surface water quality." We agree on the appropriateness of that statement and expect it will serve as a guideline in the development of the General Waste Discharge Requirements for Agricultural and Nursery Operations (GWDR) that the San Diego Regional Water Quality Control Board is expected to adopt. However, following that statement is a collection of management measures preceded by "Management measures may include but are not limited to the following:"

We do question the need to include specific management measures in the Basin Plan Amendment, especially when they “may” be included in the GWDR. Our suggestion would be to delete specific reference to management measures and save them for inclusion in the GWDR when their reference will be specific and there will be no confusion in the Basin Plan as to what will or won’t be included.

Again, thank you for accepting our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Larson". The signature is fluid and cursive, with a large initial "E" and a long, sweeping tail.

Eric Larson
Executive Director