

# SAN DIEGO REGION



## IRRIGATED LANDS GROUP

May 31, 2019

San Diego Water Board  
2375 Northside Drive, Suite 100  
San Diego, CA 92108

Attention: Chad Loflen

Comment – Proposed Basin Plan Amendment to Incorporate Biological Objectives, PIN: CW-825417

Dear Mr. Loflen,

The San Diego Regional Irrigated Lands Group is a non-profit entity organized to provide third-party services to farmers within the jurisdiction of the San Diego Water Board. Through a third party, agricultural operators can satisfy the requirements of Order R9-2016-0004 General Waste Discharge Requirements for Discharges from Commercial Agricultural Operations (GWDR).

Please reference our comment letter of February 23, 2018 on the Administrative Draft of Proposed Basin Plan Amendment to Incorporate Biological Objectives. We believe those comments remain valid.

The GWDR program is in its early years of implementation and has a robust bioassessment monitoring requirement, including biological data. In the near future all third-party groups will launch their initial bioassessment monitoring at 13 sites selected by the San Diego Water Board. The program implementation will demand substantial effort and cost for local producers. We believe it is important to allow this program to become establish and create multiple years of data before requiring revisions to the GWDR and individual farm Water Quality Protection Plans as suggested in the Proposed Basin Plan Amendment to Incorporate Biological Objectives.

Another concern is with the ability to separate the impacts that are exclusive to agriculture or other land uses. In a region continuing to urbanize, agricultural uses are increasingly surrounded by urban development, impermeable surfaces, public parks, dedicated open space, and horses kept for personal use. It will be critically important that the establishment of biological objectives accounts for mixed uses and does not saddle the farm community with curing unmet objectives that have gone into failure due to uses other than farming.

Thank you for this opportunity to comment and we look forward to continuing to work with the San Diego Water Board on protecting the region's waters.

Sincerely,



Eric Larson  
Administrator