California Citrus Mutual
California Cotton Growers and Ginners Associations
California Grape & Tree Fruit League
Fresno County Farm Bureau
Raisin Bargaining Association
Tulare County Farm Bureau
Nisei Farmers League
Western Agricultural Processors Association

May 22, 2012

Mr. Adam Laputz
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670
submitted via email to: awlaputz@waterboards.ca.gov

Re: Comments on Eastern San Joaquin River Watershed Draft WDRs and MRP for Discharges from Irrigated Lands

Dear Mr. Laputz:

The agricultural organizations identified above appreciate the opportunity to review and comment on the proposed Eastern San Joaquin River Watershed Draft WDRs and MRP for Discharges from Irrigated Lands. Accordingly, we submit the following comments.

I. Workshops

The proposed schedule for the adoption of the Eastern San Joaquin River Watershed WDR currently doesn't outline an opportunity for a public workshop conducted in the East San Joaquin region. We believe that workshops are a vital part of the process that encourages two-way dialogue between the regulator and the regulated. The Regional Board needs to hold workshops in all coalition areas, as draft orders are developed. We respectfully request that the Regional Board staff work with the coalition leads to set a dates and times in the near future to discuss the draft regulations with farmers and ranchers in their respective coalition areas.

II. Nutrient Management Plans

As groups representing farmers and ranchers in the Central Valley region, we understand the great strides that our members have taken through implementation of improved, more efficient management practices resulting in reductions. Excess nutrient application is not in the best interest of growers. They have made great progress over the years with the cooperation of UC ANR and individual commodity specific research funding programs resulting in more bountiful crops and increasing nutrient efficiency. The current draft order does not take into account the expertise and experience that our growers possess. The requirement that nutrient budgets be prepared or certified by a third-party is an unnecessary obligation that will not help further water quality objectives. Farmers know their crops and their land much better than an outside consultant and have many resources to help guide them to appropriate nutrient levels for their specific farm, soil, crop, variety and water source. Farms in the Central Valley are very diverse and some can grow up to 30 crops in any given year. Especially for these complex operations, there is no doubt that the most qualified individual to make nutrient application decisions are the growers themselves. The requirement for outside certification is not an effective or necessary requirement to achieve water quality objectives.

III. Reporting

We believe that it is essential for a successful program that all required reports should be kept on farm and reported only to the Coalition if necessary. Reporting directly to the Regional Board or to any other entity will diminish the Coalition group's effectiveness and purpose. This is a vital issue in continuing the success in the current irrigated lands program and improving water quality in the Long-term program.

IV. Organizational Structure

The current structure with the Coalitions as the intermediary is a vital component for increasing participation and efficiency in the water quality objectives. The structure began with the conditional waiver and continues to build trust and relationships with the grower

community. The structure has been successful and should be continued as the Regional Board moves into implementation of the Long-term program. We support keeping the Coalition groups structure in their current format and urge the Regional Board to continue this relationship. The success of the Regional Board's water quality objectives and efficiency depends on the continuation of the Coalition groups.

IV. Small Farms

According to USDA census data in California, farms under 100 acres make up 52% of the total number of farms but only represent 5% of the total farmland. The current draft regulation has no exemption level and would include every single acre of farmland in the Central Valley region. While we understand the goals of 100% participation, we believe that there should be an acreage level where efforts would produce the corresponding results. Just the reporting and logistics alone would create enormous cost burdens on coalition groups and regional board staff. The San Joaquin Valley Air Pollution Control District faced a similar issue when developing its Conservation Management Plans for valley agriculture. They determined during their process that farms less than 100 contiguous acres would convolute the process and not lead to a more effective dust reduction strategy. Efforts on behalf of the Regional Board staff and the coalition groups would be more cost effective and efficient in terms of water quality benefits by focusing on farms with more than 100 acres.

V. Cost Impacts

The above signed groups believe that it is vitally important to minimize the costs of the regulation. Measures that increase reporting and paperwork and add additional burdens that do not have cost-effective water quality outcomes should be re-evaluated. We believe that growers are good stewards of the land and have been implementing water quality best practices in advance of any regulation and will continue to do so without regulations that increase. In fact, costly measures will have the opposite effect. Additional monitoring and reporting costs will reduce revenues available for projects that do have a water quality benefit. Coalition groups and water districts have indicated that the additional cost impacts

on their growers could be anywhere from $2/acre to $139/acre to implement the proposed program. We remain concerned that the cost burdens associated with this program with additional fees from the Regional Board and Coalition groups coupled with the costs on the growers for implementation and reporting are not cost effective. The Regional Board should recognize that growers and the Regional Board have similar water quality goals and should work together for cost effective solutions to a complex issue.

On behalf of the above listed groups, we appreciate the opportunity to comment on the Draft WDR for the Eastern San Joaquin River and look forward to working more closely with the Regional Board on practical solutions that build on the existing coalition framework and the success of the current conditional waiver. If you have any questions please contact Casey Creamer at (559) 252-0684 or casey@ccgga.org.

Sincerely,

California Citrus Mutual
California Cotton Growers and Ginners Associations
California Grape & Tree Fruit League
Fresno County Farm Bureau
Raisin Bargaining Association
Tulare County Farm Bureau
Nisei Farmers League
Western Agricultural Processors Association

cc: Joe Karkoski, CVRWQCB
Pamela Creedon, CVRWQCB