



CALIFORNIA FARM BUREAU FEDERATION

GOVERNMENTAL AFFAIRS DIVISION

1127-11TH STREET, SUITE 626, SACRAMENTO, CA 95814 · PHONE (916) 446-4647

November 18, 2011

Mr. Richard Satkowski, P.E.
State Water Resources Control Board
Division of Water Rights
P.O. Box 2000, Sacramento, CA 95812

Submitted Via Email: rsatkowski@waterboards.ca.gov

RE: COMMENT LETTER-WATER MEASUREMENT

Dear Mr. Satkowski:

On behalf of more than 74,000 agricultural and associate members the California Farm Bureau Federation appreciates the opportunity to comment on your draft guidance for complying with water diversion measurement requirements for statement holders.

Farm Bureau's purpose is to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide safe reliable healthful food and farm products through responsible stewardship of our diverse natural resources. California's farmers and ranchers are absolutely committed to reasonable and beneficial use of our scarce water supply.

Since the passage of SBx7 8 in 2009 Farm Bureau has assisted our members in understanding the surface water diversion and use reporting requirements through extensive workshops throughout the state, numerous news articles and commentaries in our Ag Alert publication, by responding to hundreds of inquiries and by developing an extensive four-page guidance document.

We continue to hear directly from our members who are looking for clarification and additional guidance as they attempt to accurately file their reports. As you know this is a very complex issue with a wide range of specific circumstances for individual water diverters. We applaud the Water Board's efforts to further clarify requirements as new examples of confusion arise and we ask that the board develop a specific process to evaluate and resolve unanticipated circumstances to ensure water diverters and staff have clear direction.

We further ask that the Water Board understand the difficulty many of our rural members have in remote locations gaining access to their diversion points during the winter months and the difficulty some have in acquiring adequate internet access to file the required reports online.

Again, we appreciate the opportunity to comment and look forward to continuing to work with you and resolving issues as they arise. You can contact me at (916) 446-4647 or at dmerkley@cfbf.com should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Danny J. Merkley'.

Danny Merkley
Director, Water Resources