



September 10, 2010

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

Ms. Smith,

The Butte County Farm Bureau (BCFB) appreciates the opportunity to submit comments on the Central Valley Regional Water Quality Control Board Irrigated Lands Regulatory Program (IRLP) Draft Programmatic Economic Impact Report (PEIR) and Economic Analysis.

The Butte County Farm Bureau is a non-profit membership organization dedicated to the advocacy of our 1900 farm, and ranch families and consumer members whose priorities are to protect and enhance agriculture in our local community and in California.

We have reviewed the PEIR and the five outlined alternatives. BCFB believes that alternatives 2, 3, 4 and 5 will present additional increased and unnecessary regulatory burden on Butte County farmers. Furthermore, as described in the document, these same plans have the potential to increase costs, all of which will be funded by fees paid by farmers, between \$4,000,000 and \$66,000,000 – an increase of 97% from the current program.

It should also be noted that the Staff Preferred Alternative was not evaluated in the PEIR and so we are unable to evaluate the alternative's impacts on agriculture in Butte County including increased and unnecessary regulatory burdens and economic costs.

The Economic Analysis estimates it will cost a farmer \$5,000 to characterize surface and groundwater quality for low impact areas. This does not include cost for water quality testing. This particular figure represents a disproportional cost to smaller farmers. In this current depressed economic environment, these costs, as well as those mentioned above, are unrealistic and not warranted to maintain surface water monitoring.

Through discussion with other agricultural organization, including the California Farm Bureau Federation, it is important to bring attention to the Economic Analysis. Monitoring costs in this portion of the document are grossly underestimated. Furthermore, these costs vary between regions of California further varying the costs associated with the program. This makes it extremely difficult to really get a clear understanding of what potential cost will be to farmers.

BCFB believes that the work of monitoring and reporting needs to remain with the Coalitions. These organized groups best understand the farmers with whom they work with and are best equipped to maintain reporting to the CVRWQCB. There is no need to create a new system of procedures and

policies for reporting and organization when the current system in place works and has proven effective. It would be financially prudent to make the current system of coalitions work to accomplish the Goals and Objectives of the ILRP. It is our opinion that is recommendation can best be accomplished by adopting alternative number 2 as presented in the PEIR.

Again, we appreciate the opportunity to submit our comments on the IRLP. Should you have additional questions, please do not hesitate to contact us at (530) 533-1473 or at colleen@buttefarmbureau.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Colleen Cecil', with a long horizontal line extending to the right.

Colleen Cecil
Executive Director

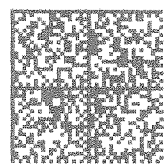


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