



CALIFORNIA FARM BUREAU FEDERATION

OFFICE OF THE GENERAL COUNSEL

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Sent via E-Mail
anne.littlejohn@waterboards.ca.gov

March 24, 2017

Anne Littlejohn
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, California 95670-6114

Re: Proposed Basin Plan Amendments to Establish a Region-wide MUN Beneficial Use Evaluation Process in Ag Dominated Surface Water Bodies and to De-designate MUN from 231 Constructed Ag Drains

Dear Ms. Littlejohn:

The California Farm Bureau Federation (“Farm Bureau”) is a non-governmental, non-profit, voluntary membership California corporation whose purpose is to protect and promote agricultural interests throughout the state of California and to find solutions to the problems of the farm, the farm home, and the rural community. Farm Bureau is California’s largest farm organization, comprised of 53 county Farm Bureaus currently representing more than 48,000 agricultural, associate, and collegiate members in 56 counties. Farm Bureau strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California’s resources.

Farm Bureau appreciates the opportunity to comment on the proposed Basin Plan Amendments to establish a region-wide Municipal and Domestic Supply (“MUN”) Beneficial Use Evaluation Process in Ag dominated surface water bodies and to de-designate MUN from 231 constructed Ag drains.

Farm Bureau appreciates the Regional Board’s evaluation of the MUN beneficial use designation in Ag dominated surface water bodies and supports the de-designation of MUN from 231 constructed Ag drains. Agricultural water bodies are unique and may not support the same level of beneficial use protection traditionally associated with perennial, natural streams. As such, a process to determine the appropriate application of, and level of protection for, the MUN beneficial use in different types of Ag dominated surface water bodies across the Central Valley is valuable. Further, the need to evaluate the level of appropriate protection of MUN beneficial uses in agriculturally dominated water bodies is necessary to in order to ensure appropriate

NANCY N. MCDONOUGH, GENERAL COUNSEL

ASSOCIATE COUNSEL:

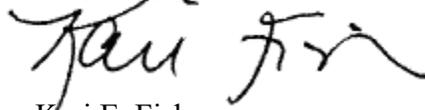
CARL G. BORDEN • KAREN NORENE MILLS • CHRISTIAN C. SCHEURING • KARI E. FISHER • JACK L. RICE

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beneficial use protection that is reasonable, considering all demands being placed on the waters and the total values involved. (Wat. Code, §§ 13000; 13241.) Additionally, establishing appropriate beneficial uses in the waters of the Central Valley is essential to remedy current problems with the existing regulatory framework and to make future regulatory requirements reasonable, effective, and efficient.

Farm Bureau appreciates the opportunity to provide comments on the proposed Basin Plan Amendments to establish a region-wide MUN Beneficial Use Evaluation Process in Ag dominated surface water bodies and the de-designation of MUN from 231 constructed Ag drains. We look forward to further involvement and discussion with the Central Valley Regional Board on appropriate beneficial uses for Ag dominated waters.

Very truly yours,

A handwritten signature in black ink, appearing to read "Kari Fisher", written in a cursive style.

Kari E. Fisher
Associate Counsel