(1/23/18) Board Meeting A-2239(a)-(c) Deadline: 12/22/17 by 12 noon





December 21, 2017

Jeanine Townsend Clerk to the Board State Water Resources Control Board P.O. Box 100, Sacramento, CA 95812 1001 I St., 24th Floor, Sacramento, CA 95814 commentletters@waterboards.ca.gov



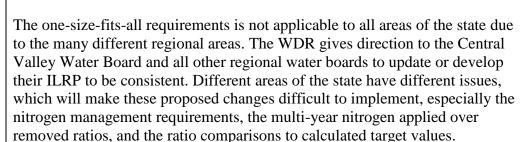
Re: Proposed Changes to the Irrigated Lands Regulatory Program (ILRP)

On behalf of the below signed county Farm Bureaus, we oppose the State Water Resources Control Board's (State Board) proposed changes to the East San Joaquin Water Quality Coalition's General Waste Discharge Requirements (WDR).

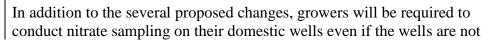


The draft includes requirements that will disrupt the existing successful irrigated lands regulatory program which has been effective in addressing surface water quality concerns and protecting water quality for years.

Unfortunately, as now has become expected with almost all State Board actions, there will be significant financial burdens placed on growers to comply with the new regulations. The proposal would inevitably lead to increased coalition/third-party costs and state regulatory fees, all which will be passed onto the farmer and/or rancher, and the WDR does not contain any meaningful cost analysis to justify these new requirements.



We also have concerns with the amount of raw data, including field-specific farm evaluation and management practice data and all nitrogen application data by field, that will be submitted to the regional water boards. Not only is the amount of data reported unnecessary, the data, although tied to anonymous identifiers, will now also become publicly available. Currently, third-parties submit data aggregated at the township level and maintain the raw data which is accessible to the regional water board, if needed. This system works and doesn't expose our farming practices to competitors or potentially cause privacy concerns.











being used for domestic purposes. This can be problematic because growers may not have legal authority to access landowner or tenant wells.

Lastly, instead of these flawed changes, we urge the State Board to focus on bringing those into compliance who have not either joined a coalition or reported directly to their respective water board. The regulation is escalating in requirements for those that have complied, yet not affected those who have not.

Thank you for the opportunity to submit these comments and concerns.

Fresno County Farm Bureau Kern County Farm Bureau Kings County Farm Bureau Madera County Farm Bureau Merced County Farm Bureau Tulare County Farm Bureau