



SACRAMENTO COUNTY FARM BUREAU

PUTTING THE FOOD ON YOUR FORK SINCE 1917

May 31, 2016



Felicia Marcus, Chair
State Water Resources Control Board
1001 "I" Street, 24th Floor
PO Box 100
Sacramento, California 95812-0100

RE: Comments to A-2239(a)-(c)

Dear Chair Marcus and Members of the Board:

On behalf of the more than 750 family farmers and ranchers of the Sacramento County Farm Bureau, please accept these comments on the proposed changes to the **East San Joaquin Waste Discharge Requirements**.

The Sacramento County Farm Bureau is a non-governmental, non-profit, grassroots organization. Our purpose is to protect and promote agricultural interests throughout Sacramento County and to find solutions to the problems of the farm, the farm home, and rural communities. 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.

Sacramento County is comprised of 994 square miles in the middle of California's Central Valley, a prime agricultural region. Sacramento County alone produces over 80 different commodities, serving as a strong contributor to California's position as the top producing state in the country.

The proposed revisions to the East San Joaquin Waste Discharge Requirements and the potential impact the changes will have on the already successful cooperative Irrigated Lands Regulatory Program are significant and costly. The revised Waste Discharge Order that was adopted in 2014 is new and growers are still learning and revising their farming practices to be in compliance with the new Order. Changing a program that has just started would be impractical and unjustifiable. Given the precedential nature of the Proposed Order, it will not only have a severe impact on agricultural operations within Sacramento County.

Of particular concern to our local farmers and ranchers is:

- Privacy concerns as coalitions would be required to submit all raw data, including field-specific farm evaluation and management practice data identified by location and all nitrogen application data by field, identified by location. This data will now become publically available. Previously, the coalitions submitted data aggregated at the township level (the coalitions maintained the raw data which was accessible to the Regional Board if needed). **The potential impacts to publicly available raw data would have a negative impact on food security and present biosecurity issues with sensitive operations.**

- Burden on operations with new and increased costs of compliance. Increase administrative costs to manage the program would directly result in an **increase cost to the coalition members, with no improvements to water quality.** Reporting requirements now apply to all growers (previously, reporting requirements varied due to vulnerability designations), and in addition to higher costs for individual growers, coalition costs, as well as Regional Board costs, will increase due to the new requirements to collect and compile all raw data.
- May erode the existence of coalitions, as the Proposed Order **undermines the usefulness and benefits of the coalitions.**
- Upsets the current monitoring and reporting requirements within the existing Irrigated Lands Regulatory Program, which provide the Regional Water Board with ample information needed to determine the effectiveness of the program regarding water quality concerns in compliance with the Water Code and the State Water Board's policies. **More information does not always equal increased water quality.** Good/relevant information results in the ability for the Coalitions to work with growers on water quality improvements.
- New nitrogen application accounting requirements will place significant new, unnecessary burdens on farmers; each farm will be required to report their crop yield; currently, only a small handful of nitrogen removed coefficients have been developed for crops grown in California; and the reporting of the multi-year ratio of nitrogen applied to the field to nitrogen removed from the field, or the A/R ratio, will become a **regulatory target.**
- Requires each farm to monitor drinking water wells, including land owner or tenant wells that you **may not have authority to access.**
- The proposed changes to the East San Joaquin Order Is precedential and would give direction to the Central Valley Water Board and all other Regional Water Boards to update (or develop) their Irrigated Lands Regulatory Programs to be consistent with the Proposed Order. Agriculture is very different in every part of the state, given regional differences, one size fits all requirements are not appropriate.

In conclusion, the Sacramento County Farm Bureau, acting as a representative of our roughly 3,000 members, requests that the State Water Board's Proposed Revisions to the Eastern San Joaquin Draft Order:

1. Maintain vulnerability designations.
2. Eliminate expansion of certification and reporting requirements on all growers in all areas.
3. Maintain current township level of reporting for management practice and nitrogen application.
4. Recognize requirements would inevitably lead to increased coalition costs and state regulatory fees and direct a new economic analysis be done.
5. Eliminate sampling of all domestic wells and reporting results on a public website.
6. Not be precedential.

Thank you for your careful consideration in this matter.



Sincerely,

Jim Vietheer
President, Board of Directors