



CALIFORNIA FARM BUREAU FEDERATION

NATURAL RESOURCES AND ENVIRONMENTAL DIVISION

2300 RIVER PLAZA DRIVE, SACRAMENTO, CA 95833-3293 • PHONE (916) 561-5665 • FAX (916) 561-5691

VIA ELECTRONIC MAIL ONLY
commentletters@waterboards.ca.gov

February 28, 2007

Song Her, Clerk to the Board
Executive Office, State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100.

February 28, 2007

RE: Comment Letter -- Methylmercury Objectives

The California Farm Bureau Federation ("Farm Bureau") hereby offers its initial comments to the *Proposed Methylmercury Objectives for Inland Surface Waters, Enclosed Bays, and Estuaries in California* ("Proposed Objectives").

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 over 91,500 farm families and individual 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. It is from this perspective that we provide the following comments to the Proposed Objectives.

On page four of the draft Proposed Objectives it states that "[a]ny adopted fish tissue objective should be protective of the populations most likely to consume fish and should be representative of the types of fish that those populations are most likely to eat." Without further explanation Farm Bureau does not see how this can serve as the litmus test for mercury standards statewide because it fails to contemplate several other equally important variables. E.g., Will this objective be modified for the various watersheds or geographic areas where there are: significant differences in actual quantities of fish, accessibility to fishing areas, or potential sources of mercury?

It also bears further investigation as to whether the proposed objectives are overly prescriptive for certain waterways. Exhibit 1 on page 5 of the draft





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Proposed Objectives provides objectives for lakes, rivers, and estuaries. Previous efforts and reports by the Central Valley - Regional Water Quality Control Board have estimated that there are more than 4,000 constructed channels designed to carry agricultural drainage and supply water, and that many of them lack the habitat and physical flow characteristics of natural channels required to sustain the full range of beneficial uses. What about these other waters of the state, how will the proposed objectives be implemented in these areas?

Finally, Farm Bureau suggests that the environmental document should contemplate the establishment of a narrative objective objective where implementation could occur at a regional level allowing for scientific uncertainty and site specific conditions to more adequately be addressed.

If there are any questions regarding this matter, please feel free to contact me either by telephone at (916) 561-5614, or by electronic mail at jhewitt@cfbf.com.

Sincerely,

A handwritten signature in cursive script that reads "John Hewitt".

John Hewitt