



December 21, 2017

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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.

The one-size-fits-all requirements is not applicable to all areas of the state due to the many different regional areas. The WDR gives direction to the Central Valley Water Board and all other regional water boards to update or develop their ILRP to be consistent. Different areas of the state have different issues, which will make these proposed changes difficult to implement, especially the nitrogen management requirements, the multi-year nitrogen applied over removed ratios, and the ratio comparisons to calculated target values.

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.

In addition to the several proposed changes, growers will be required to conduct nitrate sampling on their domestic wells even if the wells are not

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