



Shasta County Farm Bureau

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To Whom It May Concern:

I am writing on behalf of the Shasta County Farm Bureau and our 600 agricultural members, farmers and ranchers. I have been following the State Water Resources Control Board's Draft Order revising the East San Joaquin Water Quality Coalition's General Waste Discharge Requirements. As a farmer in California, I am concerned that the operations of my members will be negatively burdened by the Draft Order.

The proposed revisions and the impact the changes will have on the currently successful Irrigated Lands Regulatory Program are significant and costly. California is the most agriculturally diverse state and a "one size fits all" ordinance will not satisfy the reporting needs for the various agricultural practices that take place across the state. Chemical and fertilizer use varies with crop and region so the risk to water quality varies by region. In Shasta County, ranchers may hold a soil test and apply nitrogen to their pasture every 3-5 years, but the nitrogen levels are nowhere near those applied to row crops or other produce. The pasture is then used to cultivate hay crops that are not measurable by these reporting standards for nitrogen use per crop.

There is also issue in Shasta County because of the large amounts of illegal marijuana growth that affect the nitrogen levels. If a compliant farmer does the nitrogen test required and finds an unhealthy level, how will the governing agency discern that the nitrogen is from the farmer's property or that of the marijuana grower? This could pile more expense to the farmer to control a health hazard that isn't his doing and may be out of his control.

The Draft Order also requires each farm to annually monitor all drinking water supply wells on the property. This is problematic, especially because growers may not have legal authority to access landowner or tenant wells.

We recommend that the SWRCB look at adopting general orders for irrigated crops based on risk and revenue so that the burden is levied fairly and equitably across the state. In Northern California we are all low risk or vulnerability, yet we pay the same fees as those who cultivate produce in Salinas Valley. Making general regulatory changes that apply to farmers varying from hobby farms to large operations is going to burden the lower level agriculturalists.

Thank you for considering my views.

Erin Johnson
Manager
Shasta County Farm Bureau