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

**TO**: State Water Resources Control Board

**FR**: William Hagge, President - North Eastern California Water Association

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

Changes to the Irrigated lands Regulatory Program will impact all of the private landowners in our watershed in a negative way. The North Eastern California Water Association represents a high altitude growing area, from 3500 feet up to 5000 feet. This limits our growing season to about 120 days of growing season at the lower elevation and 100 days of growing season on anything above 4200 feet. Frost doesn't leave our upper elevation till about June 1st and then will come back usually around September 1st. Because of our limited growing season it also limits the type of crops we can grow. The majority of our crops are Pasture, Alfalfa, Meadow, Grain and Wild Rice. The Profit margin with these crops are quite low and the cost that are associated with this new proposal will create a financial hardship for our Farmers and Ranchers. The cost of testing our wells, the cost of certifying our irrigation and nitrogen management plans, the cost of increased fee because of the increased work load and potential increase of staffing at our regional boards. The proposed changes does not include any meaningful cost analysis to justify these new requirements. This new proposal mandates a statewide one-size-fits –all program that is just not needed and goes to far on the regulatory front. The State Water Resources Control Board should not allow these changes to be precedential and applied statewide. The Northern portion of our state is different in rainfall amounts, drainage, commodities grown, number of crops grown (1),topography and we have a different reliance on surface water and groundwater. In summary, the draft order would significantly alter our current irrigated lands regulatory program and the costs associated with those changes would have a significant negative impact on our Farmers and Ranchers.

Sincerely; William Hagge

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