

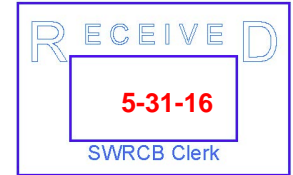


Yolo County Farm Bureau

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May 31, 2016



Ms. Jeanie Townsend
Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

commentletters@waterboards.ca.gov

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

Dear Chair Marcus and Members of the Board:

As President of the Yolo County Farm Bureau I am also President of the Yolo County Farm Bureau Education Corporation, the entity that administers the Irrigated Lands Regulatory Program for Yolo County growers. We have worked very hard to provide a program that makes it as easy as possible for growers to comply and enter the required information. In the past two years we have spent over \$135,000 to develop software that enables us to do this. Evidence that we have compiled and submitted over the years has demonstrated that the current ILRP is working as it was intended.

The Proposed Order for the East San Joaquin Water Quality Coalition would require that we spend another large amount of money to modify the program to meet the additional requirements. We are already looking at another large fee increase because we've had to hire a second full-time person (in addition to numerous temps during the year) to handle the job of complying with the current order. Depending on how much the program is changed, another major change to the system could cost our sub watershed as much as an additional \$150,000 which we cannot afford, and more to the point is being demonstrated by testimony and facts as unnecessary.

I attended the hearing in Sacramento, I was in the room listening to your own Regional Boards testify to you that the proposed changes were not only unnecessary, but unworkable as well. These statements, coming from your own Regional staff, are gross understatement when applied to the real landowners and farmers who are struggling to adapt to myriad regulations and mandates that have been thrust upon us in the past few years. Despite all of this, we are doing our best to comply, and at least in our sub watershed, a growing mountain of evidence shows that the current ILRP is working well.

One of the biggest issues of concern in some areas of rural California is nitrates in drinking water, and it does need to be addressed. However, the ILRP is not the appropriate way to manage this problem because it's only mechanism to reduce nitrates in groundwater is to ultimately regulate how much fertilizer a farmer can apply and when. The problem is that most of the nitrates that are showing up in drinking water have been dated to fertilizer applications that were made as much as 60 years ago – a time when synthetic fertilizers and their use were in their infancy. Despite EJ attorneys' grossly misrepresentative assertions to the contrary, modern agriculture is significantly more careful, and prudent in its application of fertilizer, having learned from decades of experience and research, not to mention financial realities that already limit fertilizer (and pesticide) use to the minimum amounts required. The unfortunate reality is that even cutting the current prudent agricultural fertilizer use to zero will not reduce the nitrate levels in drinking water for many years, yet such a policy would have far reaching and devastating results to our ability to provide food and fiber in California – the leading agricultural state in the nation. It would be far more timely and useful for the state to focus on affordable, local treatment solutions for drinking water.

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If the Proposed Order is adopted, our coalition will look very hard at the increased costs, vs the additional work load to gather more site specific information that ultimately will result in no increased environmental benefit, but will facilitate potential nuisance lawsuits. Our sub watershed coalition may find itself of no value to our members and we may decide it is not in the best interest of our growers for us to continue administering the program.

We have entered a period in California in which the business climate for agriculture has turned toxic. The "environmental justice" community, legislators and regulators have completely lost sight of the value and benefits to society that agriculture provides to our state. There seems to be an assumption that California's farmers are not the well educated professionals that we are, and there is no recognition of the significant efforts in modern agriculture to improve the safety and sustainability of what we do. Legislators and regulators take for granted how truly safe, plentiful and inexpensive their food is - while failing to recognize that in order to provide the agricultural bounty that we do - for the benefit of all - farmers must be able to make a decent living. In recent weeks we have heard numerous growers comment that the Proposed Order, combined with the sudden increased minimum wage, possible change in overtime costs, and all the other mandates and reports required by various government agencies are just too much and will drive them out of business.

I strongly recommend that you listen closely to growers as they document the Proposed Order is not acceptable. Please step back and do not adopt the Proposed Order, but recognize that the Central Valley Regional Water Quality Control Board Irrigated Lands Regulatory Program is working well to regulate water quality.

Respectfully submitted,



Jeff Merwin
President