



SONOMA COUNTY FARM BUREAU

Affiliated with the California Farm Bureau Federation and the American Farm Bureau Federation



December 16, 2015

State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Via Email: commentletters@waterboards.ca.gov
paul.wells@waterboards.ca.gov

RE: SB 88 and the Draft Emergency Regulation for Measuring and Reporting on the Diversion of Water

Dear Board Members and Staff,

Sonoma County Farm Bureau (Farm Bureau), an organization representing nearly 3,000 family farmers, ranchers, rural landowners and agricultural businesses in Sonoma County, appreciates the opportunity to share the organization's thoughts on SB 88 and the Draft Emergency Regulation for Measuring and Reporting on the Diversion of Water.

After reviewing the language within the proposed emergency regulation for measuring and reporting December 7, 2015 agency draft for public comment, Sonoma County Farm Bureau would like to reinforce the comments below made by Mendocino County Farm Bureau as well as those made by California Farm Bureau Federation.

Since reporting deadlines will potentially be changing for a number of diverters, it is requested that the SWRCB promptly notice all diverters of the required changes to reporting deadlines. It is also important that the eWRIMS online reporting system be altered in a timely manner in order for diversions to be reported prior to the deadline. Directions for how to properly report under the requirements of SB 88 and the related regulation should also be clearly described to diverters in future correspondence.

If changes to reporting frequency are to be implemented, sufficient evidence of a benefit to the watershed or subwatershed needs to be considered for the additional reporting and data processing requirements. Sufficient notice should be provided to diverters if any change in reporting frequency is anticipated.

This regulation will create additional monitoring standards for a number of diverters and will add layers of complexity to the reporting process. The complexities of individual diversion systems and fiscal impacts to the diverter need to be considered. Will there be an economic impact report affiliated with this regulation?

SWRCB needs to be prepared to provide workshops throughout California to discuss the new compliance standards, timeframes for compliance, etc. and address diverter questions once the regulation is adopted.

Sonoma County Farm Bureau appreciates your consideration on these issues.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff Carlton".

Jeff Carlton, chairman, Natural Resources and Environment Committee

CC: Board of Directors, Sonoma County Farm Bureau; Devon Jones, executive director, Mendocino County Farm Bureau; Jack Rice, associate council, California Farm Bureau Federation