

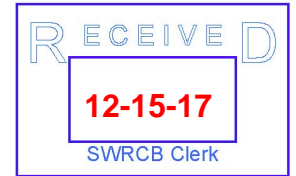


SAN LUIS OBISPO COUNTY FARM BUREAU

4875 MORABITO PLACE, SAN LUIS OBISPO, CA 93401

PHONE (805) 543-3654 • FAX (805) 543-3697 • www.slofarmbureau.org

December 15, 2017



Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor (958141)
P.O. Box 100
Sacramento, CA 95812-0100

Via Electronic Message

Re: Comments – East San Joaquin Ag. Order A-2239(a)-(c)

Dear Ms. Townsend and Members of the Board:

The San Luis Obispo County Farm Bureau, and its nearly 1100 members, are longtime stewards of water resources in our area. Members actively participate in programs and proposals that are put-forth to protect or improve water resources. We are submitting the following comments regarding the Draft East San Joaquin Ag. Order A-2239 (Draft Order) because of the far-reaching, precedent setting nature of some elements of the proposal.

Farm Bureau members currently comply with the Irrigated Lands Regulatory Program and recognize the intent to protect the State's groundwater resources and water quality. The Draft Order, if exported to the entire State, takes away the ability to address local, and specific, issues.

The Draft Order includes requirements that would disrupt the existing irrigated lands regulatory program and the Sustainable Groundwater Management Act, which are and will be effective tools in addressing water quality concerns. The expansion of the Nitrogen Management Plan to all growers, whether nitrogen is applied or not or at extremely low levels, is just one of several elements that appear unwarranted and unwise.

Given the vast regional differences in California, and in each county, one-size fits all requirements applicable to the entire state are not appropriate. There are even vast regional variances in San Luis Obispo County. Geographic areas of the state and counties face dissimilar issues and not all farmers grow the same crop every year, which would make this Order very difficult to implement – especially the nitrogen management requirements, the multi-year nitrogen applied over removed ratios, and the ratio comparisons to calculated target values. Additionally, because of these vast regional differences, all growers would have the same reporting and record keeping requirements regardless of their particular nitrogen issues – or non-issues – which would present a further financial burden to many of our local growers.

Protecting or improving water resources can be accomplished without a vast expansion of staff, data, and costs. The cost of compliance for administration and reporting will significantly increase at the Water Board and at the farm level, if the Draft Order is adopted. Under the new Order, reporting requirements would unvaryingly apply to all growers, whereas currently, reporting requirements vary due to vulnerability designations. In addition to increased costs for individual growers, coalition costs and regional water board costs would rise due to the new requirements to collect and compile all raw data..

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 would be submitted to regional water boards. The data, although tied to anonymous identifiers, would also become publicly available. Currently, aggregated data is submitted at the local level, which is accessible to the regional water board if needed. This method works and does not expose farmers' practices to competitors or potentially cause privacy concerns.

Additionally, the Draft Order would require each farm to monitor all drinking water supply wells on the property on an annual basis. This would be challenging because growers may not have legal authority to access land owner or tenant wells.

To conclude, the results of these requirements would unavoidably lead to increased grower/coalition costs and state regulatory fees, and the Draft Order does not contain any meaningful cost analysis to justify these new requirements. The San Luis Obispo County Farm Bureau refutes any one-size fits all approach to water quality.

Thank you for your consideration of our comments.

Sincerely,



Anna Negranti, President
San Luis Obispo County Farm Bureau

an:jg