

From: Gerald Cederquist
To: [commentletters](#)
Subject: Comments to A-2239(a)-(c)
Date: Monday, December 4, 2017 4:30:04 PM



Dear Clerk to the Board Townsend,

Dear State Water Resources Control Board:

I wish to comment on the proposed changes to the Irrigated Lands Program.

1. I would suggest that making program requirements apply equally to all parts of the state will actually make it more difficult to address and solve regional problems. Different watersheds and geographic areas have different properties and needs.
2. The additional record keeping that might be required for reporting irrigation and for reporting for farms that are in low to no vulnerability areas adds to the already substantial administrative burden of reporting required of farmers by various regulatory agencies. In particular, for a small grower who does not have an employee dedicated to administrative tasks the existing reporting workload is already frustrating.
3. I currently have a rental house on a farm property which I purchased from an elderly couple a few years ago. Their on-ranch home suffered from a lot of deferred maintenance but was nonetheless a substantial residence. I decided that rather than razing it I would rent it out and help provide decent affordable housing in a county where such is in short supply, and thus I became an accidental landlord. My only goal in collecting rent is to offset my expenses for maintaining this house. I am a farmer; turning this rental into a profit center is not my plan. Under the proposed regulation I will be forced to be responsible for administering water samples annually and likely will face penalties if I forget to do this. The additional burden, along with the upcoming expenses of some high cost repairs such as replacing an ageing roof will combine to force me into making the decision to eliminate an affordable housing rental. Farmers becoming unplanned landlords when they purchase a ranch property with an existing home is a common occurrence, and I suspect that other farmers will also decide that maintaining country rental homes is simply too much hassle.
4. I 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 will be submitted to the regional water boards and become publicly available. Currently, third-parties submit data aggregated at the township level and maintain the raw data which is accessible to the regional water board if needed. This system works and doesn't expose my farming practices to competitors or potentially cause privacy concerns.

Thank you for considering my views.

Sincerely,

Gerald W. Cederquist
8606 N Fuller Ave
Fresno, CA 93720
cwayneone@comcast.net