

Date: December 8, 2017
To: State Water Resources Control Board
1001 I Street
Sacramento, CA 95814
From: Vernetta Marsh
1205 Gazelle Place
Davis, CA 95616



Members of the State Water Board,

My comments are in reference to your second draft order issued October 10, 2017 regarding the changes to the management and monitoring of irrigated lands---Eastern San Joaquin River Watershed Agricultural Order SWRCB/OCC Files A-2239 (a-c).

My family is a small farming family in Colusa County, Sacramento Valley. The ground that we farm is irrigated, with water from Irrigation Districts and wells. My grandchildren are the 7th generation on this land. We have a very deep attachment to this land; it is part our very being. Unfortunately despite our care of the land and water, the increasing onerous, complex, costly, time consuming and overbearing rules and regulations do not bode well for us, just as it does not bode well for other small farmers with irrigated lands.

Although, the second draft order issued on October 10, 2017 is directed to the East San Joaquin because of problems identified by the State Water Board, the State Board proposes that most of the changes be precedential, meaning that the Water Board will apply those revised changes to all irrigated lands statewide. All current irrigated lands regulations in all regions of the State will be required to revise, update and even develop any existing regulations and programs to conform with this State Board' order. It will affect all growers and farm owners throughout the state. It does not recognize the successful programs that already exist and have been very effective and because of the success, should not be disrupted.

The reporting requirements, which currently affect only the high vulnerability areas, will, with the changes affect all areas. This greatly increases the volume and detail of reporting required from those who are not high vulnerability. Also included are the requirements for very specific training, education, certification and outreach on the part of the farmer. These are significant negative impacts on the small farmer increasing the time required and associated costs taking the farmer away from the operational part of farming. Add to the above, the detail of data required to meet the formulas' equations for reporting. For the family farms in the non-high vulnerability areas it is an unreasonable requirement.

More than once, comments made during panel discussions at Water Board, agricultural co-op meetings, and general farmer meetings have been the same theme---It is becoming increasingly difficult and costly because of onerous, costly, time consuming rules and regulations to farm in California. Unlike many types of enterprises, farmers cannot pick up their lands and move out of State. If, at the end of the day, the farmer has not been able to finish operational work and has not made money, the farmer will soon be out of business. That is the reality. What will those farm lands become? They will become part of a very large corporate farming operation. Our family will lose that part of our lives that has been what we are since the 1800s. A very sad day for us, as it will be for other farm families who have had to do the same. We also recognize that everyone is not making their best efforts to be good stewards of their farmlands. To make broad sweeps to include everyone because of those who have or created major problems with their water and soil is an injustice and punitive to those who do not create problems and do not have the problems.

The ease of obtaining confidential private information about a person or a field is made easier through making the data easily identified and making it public, and through technology lends to abuse of the information and even what could be considered "Domestic Terrorism". If fields' and/or farmer/growers' specific information is available to the general public, It is also too easy for the farmer/grower or fields to be targeted and incur vandalism or serious harm. This is a real concern; especially with the wide disconnect between the agricultural sector and the non-Ag sector and others whose ideology denies farming.

To summarize, the State Board should take a serious review of the proposed changes---not increase the authority of the State by imposing farming- destructive rules and regulations, but to consider that what the Board is proposing is a destructive action to the small family farmers of California.

Thank you for accepting these comments which have been submitted with an sincere concern to preserve family farms and farming as a good life.

vm
