



TEHAMA
COUNTY
FARM
BUREAU



May 27, 2016

Ms. Jeanie Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
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:

The Tehama County Farm Bureau represents nearly 800 farming and ranching families who raise a variety of agricultural commodities in northern California. We have been watching the process for the State Water Resources Control Board's Proposed Order revising the East San Joaquin Water Quality Coalition's General Waste Discharge Requirements, and we are concerned that our members' ability to continue to run their operations will be unnecessarily negatively impacted by the Proposed Order.

The proposed revisions to the East San Joaquin Waste Discharge Requirements and the potential impact the changes will have on the already successful cooperative Irrigated Lands Regulatory Program, which has been in place for over a decade, are significant and costly. Given the model this Proposed Order could potentially establish, it will not only have a severe impact on agricultural operations within the Central Valley, but throughout the state. Of particular concern to our membership are the following:

- *The new nitrogen application reporting requirements will place significant new, unnecessary burdens on farmers, as each farm will now be required to report their crop yield. Currently, only a few "nitrogen removed" coefficients have been developed for crops grown in California and the reporting of the multi-year ratio of nitrogen applied to the field to nitrogen removed from the field (A/R ratio) will become a regulatory target with problematic compliance standards.*
- *The Proposed Order requires each farm to monitor its drinking water wells, including land owner or tenant wells that the land owner/operator may not have the authority to access.*

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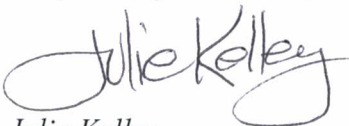
275 Sale Lane
Red Bluff, California 96080

- *Reporting requirements will now apply to all growers, where it has previously been based on vulnerability designations. In addition to higher costs for individual growers, the coalition costs and Regional Board costs will increase due to the new requirements to collect and compile all raw data.*
- *All Regional Water Boards will be required to update (or develop) their irrigated lands regulatory programs to be consistent with the Proposed Order. With more than 400 commodities grown in California and distinct regional differences, a one size fits all set of requirements, applicable to all areas of the state, would not be appropriate.*
- *The requirements for the coalitions to submit all raw data which then becomes publically available, including field-specific farm evaluation, management practice data and all nitrogen application data by field, identified by location, creates very real privacy concerns.*

We hope the board will reevaluate and revise the precedent setting terms of the East San Joaquin proposed order given the significant and unnecessary burden it may impose on agricultural producers in Tehama County and throughout the state.

Thank you for taking into consideration our input and concerns.

Respectfully submitted,

A handwritten signature in cursive script that reads "Julie Kelley". The signature is fluid and includes a large loop at the end of the last name.

Julie Kelley
President

Tehama County Farm Bureau