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On Behalf of Petitioners Jensen Family Farms, Inc.
And William Elliott

STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD

In the Matter of Adoption of Order No. R3-
2012-0011 by the Central Coast Regional
Water Quality Control Board for the
Conditional Waiver of Waste Discharge
Requirements for Discharges from
Irrigated Lands

) SWRCB/OCC FILES A-2209(a) - (e)

) STATEMENT BY PETITIONERS
) JENSEN FAMILY FARMS, INC. AND
) WILLIAM ELLIOTT IN RESPONSE TO
) NOTICE OF PUBLIC HEARING ON
) STAY REQUESTS

) [DECLARATION OF ROSS N. JENSEN
) FILED CONCURRENTLY]

A stay should be granted precluding the implementation of Central Coast Regional Water Quality Control Board Order No. R3-2012-0011 relating to the Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands ("Conditional Waiver"). As set forth in the Declaration of Ross N. Jensen, filed concurrently with the filing of the present Statement, the cost of near-term compliance with the Conditional Waiver by the first dates set for such compliance (October 2012 and 2013) are burdensome: e.g., the costs building and

maintaining containment structures (Conditional Waiver Condition No. 33) would conservatively cost Jensen Family Farms \$275,525.25 during the effected period.

This and the other costs of compliance set forth in the Ross Jensen Declaration (which deals only with the six (6) ranches operated and/or owned by Jensen Family Farms, Inc. which comprise a little over 1000 acres in total) translate into higher costs of production (and an actual loss of approximately 20 acres of farmland presently under cultivation but which must, upon implementation of the Conditional Waiver, must be set aside as a 30-foot buffer on all lands abutting endangered water bodies). That, in turn, translates into a higher wholesale price charged by Jensen Family Farms for, for example, lettuce grown by it which, in turn, results in a higher end-sale price to members of the public. It is estimated, for instance, that compliance with the construction/maintenance costs for containment structures alone will result in a 2 - 4% increase in the price of lettuce to be purchased by members of the public in California, other States, and, indeed, foreign countries. This would have an obvious impact on the nation's inflation rate and food supply, particularly in conjunction with the drought-effects faced by corn and soy-bean producers in the Mid-West and Southern regions of this Country. If the costs of compliance are not borne by the purchasing public, then the costs of compliance must be taken out of existing revenues. That would result in the need to terminate (or not initially hire) employees who harvest the crops as well as the need to cut back on supplies and capital expenditures which contribute to the economic vitality of the Region's commerce. The economic impact of that is, of course, cascading when combined with the cutbacks to be borne by other farming operations.

The costs set forth in the Jensen Declaration highlight the need for a stay because of the Regional Board's patent failure to comply with the requirements of Water Code Section 13241 which defines the duties of the regional boards and provides, in pertinent part,

"Each regional board shall establish such water quality objectives in water quality control plans as in its judgment will ensure the reasonable protection of beneficial uses and the prevention of nuisance; however, it is recognized that it may be possible for the quality of water to be changed to some degree without unreasonably affecting beneficial uses. Factors to be considered by a regional board in establishing water quality objectives shall include, but not necessarily be limited to, all of the following: ...

- (d) Economic considerations.**
- (e) The need for developing housing within the region.**
- (f) The need to develop and use recycled water."**

(Emphasis supplied). A review of the Conditional Waiver and its accompanying record reveals that the Regional Board did not adequately, if at all, address the economic matters set forth in the Jensen Declaration as they relate to agriculture and similarly-situated farmers in the Central Coast Region (a consideration or discussion that is necessarily separate and apart from any discussion of such factors under a California Environmental Quality Act analysis, particularly since economic considerations under CEQA are relevant only insofar as they have a direct relationship to environmental effects.) This sort of patent violation of the statutory basis for the Regional Board taking any action at all not only affects a great embarrassment to the Board itself but, more importantly, also negatively impacts the legality of the Board's actions as a whole since it renders its adopted Order categorically arbitrary, unreasonable, and capricious. Indeed, the economic harm that will be caused by the immediate implementation of the Conditional Waiver absent a stay is patent since farm operations similarly situated to Jensen Family Farms

will all suffer the need to expend vast amounts of money due to the immediate costs of compliance and also lose significant productive acres due to the 3-foot buffer zone.¹

That immediate implementation of the Conditional Waiver will have an immediate and enormous impact on the agricultural economy of the Region – which is by far the largest segment of the Region's economy – is obvious to anyone willing to look at the situation with open eyes and a non-hydrocentered focus. Indeed, it is not at all speculation that the 30-foot buffer zone will cause literally thousands of acres of farmland now under cultivation to cease being under cultivation. The direct economic impact of that is obvious and non-speculative: fewer crops will be grown resulting in fewer crops being sold and otherwise being made available to the public which lowers profits and the funds available for use by the owner/operator to "grow" the Region's economy. All of these are a surefire means of affecting economic stagnation in an industry which is now just about the only California industry successfully working its way out of the current recession and economic downturn.

The economic market place reaction alternative to lower profits for the farmer is, of course, an increase by the farmer in the sale price of his produce. That increase directly results in higher food costs to the public (which, like higher gasoline costs) further contributes to inflation and economic stagnation. That such would have a great effect on the ever-increasing rate of inflation in the domestic economy and, particularly, in its food sector, a situation aggravated by the Mid-West and Southern State drought regions in which farm production (primarily corn and soy-beans but also produce similar to that grown in the Central Coast

¹ It should also be noted that the loss of production that is discussed in the Jensen Declaration is shared by other similarly situated farming operations. That loss of production (due to lands being set aside for the 30-foot buffer zone conflicts with the California Leafy Green Marketing Agreement ([see www.ccof.org/leafygreens](http://www.ccof.org/leafygreens)) and the "super metrics" adopted by the California food production industry to address food safety concerns. Neither of these matters were, of course, discussed or even addressed by the Staff in its Proposal or by the Regional Board in its enactment of the Order.

Region) will greatly decrease in the coming months and result in higher retail food costs to the public.

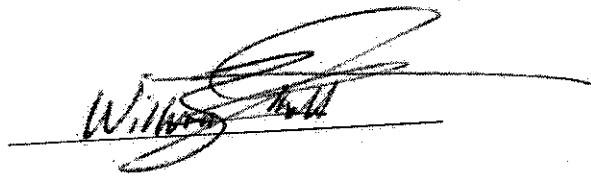
Further, the amount and a decrease in the value of the land currently under cultivation which the Order affects due to the 30-foot buffer zones under the Order is the inexorable result of having to let the buffer area lay fallow in terms of crop production. That will necessarily result in a significant decrease in land values and accompanying property taxes paid which, in turn, impacts the amounts of money available to local, county, and state governmental units (including this Board). Such "economic considerations" was also overlooked, ignored, and played no role in the decision to adopt the Conditional Waiver. Just as a decrease in property taxes will result in further layoffs and furloughs of public employees, cutbacks in the number of laborers necessary to service the agricultural industry in the Region occasioned by having significantly fewer acres available for cultivation will occur: the results of that will be a reduction in the monies being spent in the Region's economy, an increase in governmental benefits being paid to the unemployed, a movement of individuals out of the region, increased foreclosures of homes now being purchased by unemployed laborers, and the resulting impact on the taxes that may be collected by the local and state governments. Indeed, a cascading detrimental economic effect and impact is likely to occur as a result of the Order.

Other aspects of the Conditional Waiver (including the costs attendant to purchasing, maintaining, and operating the technologies necessary to comply with the pollution control guidelines) will have a similar economic impact: farmers will have to charge more for their products in order to maintain their presently slim profit margins, the cost of living and inflation will increase due to the rising cost of agricultural products, laborers will either not be hired or will be terminated as cost-savings measures necessary to maintain the economic integrity of the

farms (the effect of which will be the same as that mentioned above). A variety of other dire economic results will also obtain. In other words, the "butterfly effect" poses a serious economic result to the Region and, indeed, to the country's economy as a whole (noting that, for instance, the CPI increased approximately 1% in 1995 when, due to widespread flooding in the Salinas Valley, few crops were harvested and the costs of vegetables/lettuce/berries, both domestic and imported, increased).

The only means available to avoid these costs and attendant damage to the economy of the Central Coast Region and, indeed, the United States as a whole, is to stay implementation of the Conditional Waiver until this Board has the opportunity to fully review its terms in the harsh and revealing light of the facts and the record. That review will, in all likelihood, result in a finding that the Conditional Waiver cannot be placed into effect and, hence, that the funds expended pending such a finding by this Board should not have to be expended.

Date: August 25, 2012


William Elliott

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**STATE OF CALIFORNIA
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)
) **SWRCB/OCC FILES A-2209(a) – (e)**
) **DECLARATION OF ROSS N. JENSEN**
) **IN SUPPORT OF RESPONSE OF**
) **PETITIONERS JENSEN FAMILY**
) **FARMS, INC. AND WILLIAM**
) **ELLIOTT IN RESPONSE TO NOTICE**
) **OF PUBLIC HEARING ON STAY**
) **REQUESTS**
)
) **[STATEMENT FILED**
) **CONCURRENTLY]**
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I, Ross N. Jensen, declare:

- 1. I am a director and former President of Jensen Family Farms, Inc., a California corporation having its principal place of business in Monterey County, State of

California. In that capacity, I am personally familiar with the business, operations, and, indeed, the entirety of Jensen Family Farms, Inc. If called upon to testify, I would and could truthfully testify to the matters set forth herein which are offered in support of the entry of a stay of all or part of the Central Coast Regional Water Quality Control Board Order No. R3-2012-0011.

2. Jensen Family Farms, Inc., is a family-owned farming corporation that owns and/or operates six (6) separate farms in the Salinas Valley (five of which are located between Chualar and Salinas and one of which is located on Blanco Road west of Salinas) all of which total approximately 1040 acres currently in production. This closely held corporation is the present corporate manifestation of what is a fourth-generation family farming operation in the Salinas Valley that dates back more than 100 years. The six referenced farms are designated by the following names and locations:
 - a. Spence ranch which is located on Spence Road and abuts Highway 101, Quail Creek, and the Salinas River for over one mile (a true and correct copy of a Google Map overview of this ranch, including the length, in feet, of abutment on the Salinas River and Quail Creek) is Exhibit 1 hereto and is incorporated herein by reference;
 - b. Somavia ranch which is located on Somavia Road and abuts Highway 101 as well as the Salinas River (a true and correct copy of a Google Map overview of this ranch, including the length, in feet, of abutment on the Salinas River) is Exhibit 2 hereto and is incorporated herein by reference;

- c. Esperanza ranch which is located at 1776 Old Stage Road and abuts Esperanza Road and Old Stage Road and is bisected by Esperanza Creek (an impaired water body) (a true and correct copy of a Google map overview of this ranch, including the length, in feet, of abutment with Esperanza Creek is Exhibit 3 hereto and is incorporated herein by reference);
- d. Wallace ranch which is located on Old Stage Road and abuts Quail Creek (a true and correct copy of a Google Map overview of this ranch, including the length, in feet, of abutment on Quail Creek is Exhibit 4 hereto and is incorporated herein by reference);
- e. Bundgard ranch which is located on Potter Road and abuts Quail Creek (a true and correct copy of a Google Map overview of this ranch, including the length, in feet, of abutment on Quail Creek is Exhibit 5 hereto and is incorporated herein by reference; and,
- f. Blanco ranch which is located on Blanco Road west of Salinas and abuts Blanco Drain (a true and correct copy of a Google Map overview of this ranch, including the length, in feet of abutment on Blanco Drain is Exhibit 6 hereto and is incorporated herein by reference).

Each of these farms is irrigated by well water pumped to the surface and by rain water. Various row crops consisting of iceberg lettuce, romaine lettuce, red leaf lettuce, broccoli and asparagus are grown on the respective farms. During the past 5 years, a sizeable percentage of the Esperanza ranch was dedicated to large-scale organic farming of asparagus. As a non-multinational non-vertical agribusiness, Jensen

Family Farms, Inc. has close ties to the Salinas Valley and, in fact, is preparing for the next (fifth) generation to carry on family traditions of nurturing the land.

3. I have had occasion to read and review significant portions of Order No. R3-2012-0011 adopted by the Central Coast Regional Water Quality Control Board for the Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands (“Conditional Waiver”). All of the various ranches described above are and will be impacted by this Conditional Waiver. I have also reviewed the Notice of Public Hearing on Stay Requests (“Notice”) issued by this Board, a document in which Jensen Family Farms, Inc. has been designated as a “party” due to its timely filing, with others, of a Petition for Review of the Conditional Waiver Order.
4. The Board, in its Notice, requested cost estimates, and the underlying assumptions for those cost elements, for the implementation by farmers of various provisions of the Conditional Waiver. I have conducted extensive research as to many of the items designated in the Notice in order to ascertain, for Jensen Family Farms, as to these costs and set them forth below. The bottom line of these costs, at least for Jensen Family Farms, is that they directly translate into higher costs of production and, hence, a higher retail market price for the various crops grown by Jensen Family Farms of at least 2 – 4%. When combined with price inflation occasioned by the current drought in corn- and soybean-producing areas of the United States, this increase in the price of lettuce and other products will detrimentally affect consumers in California, other parts of the United States and, since a great deal of California produce is shipped overseas for sale, consumers throughout the world.

5. The Notice first requests cost estimates relating to the installation of back flow prevention devices (Provision 31 of the Conditional Waiver). Based upon my research and arising from having obtained quotes from businesses which Jensen Family Farms would, in the usual course of its business, contract with concerning the installation of such devices, it is estimated that the minimum cost (excluding travel time charged by the installers) is \$20,393.39. A true and correct copy of a spreadsheet prepared by me containing the information leading to this amount is Exhibit 7 hereto and is incorporated herein by reference. For purposes of convenience, that total figure was reached based on the following costs information:

- a. Esperanza Ranch: Materials cost (new devices) \$5345.18, labor costs \$2100, 2% Ag tax cost \$148.90 – all for a total of \$7594.08;
- b. Wallace Ranch: Materials cost of \$1957.60, labor costs \$700.00, 2% Ag tax cost \$53.15 – all for a total of \$2710.75;
- c. Somavia Ranch: Materials cost of \$1957.60, labor costs of \$700.00, 2% Ag tax cost \$53.15 – all for a total of \$2710.75;
- d. Bundgard Ranch: Materials cost of \$1957.60, labor costs of \$700.00, 2% Ag tax cost \$53.15 – all for a total of \$2710.75;
- e. Spence Ranch: Materials cost of \$2041.20, labor costs of \$1,200.00, 2% Ag tax cost \$64.82 – all for a total of \$3306.02; and,
- f. Blanco Ranch: Materials cost of \$734.85, labor costs of \$600.00, 2% Ag tax cost \$26.69 – for a total of \$1361.04.

Based upon my experience in the agricultural industry, the total estimate cost (\$20,393.39) is likely to be increased as the various valves are purchased and installed

due to, among other reasons, travel costs and increases in the costs of fuel and steel (which lately have quite literally increased daily).

6. The Notice requests cost estimates for the maintenance of containment structures that would necessarily have to be built on the various ranches (Conditional Waiver Condition No. 33). Those structures include ponds and drainage ditches and the costs attendant to them include excavation costs, hauling costs, and preparation of the sides of the respective structures. I have consulted with various businesses which perform work of this nature (including Henningsen Construction Company, Inc. which is located in Salinas, California) and have received cost estimates for all of the ranches discussed above totaling \$275,525.25. A true and correct copy of a spreadsheet setting forth, ranch by ranch, the minimum costs incident to construction and maintenance of containment structures is Exhibit 8 hereto and is incorporated herein by reference. It must be noted that this figure does not include the costs of permits, liners, plumbing, sand fill or dump site maintenance which will no doubt significantly add to the total amount. However, using the smaller number, the average cost per acre is approximately \$236.66. When this number is applied to the fact that production of lettuce, for instance, is approximately 900 cases per acre, the cost of production of each head of lettuce is increased somewhere between one and two cents (a figure that is reached by dividing the per acre cost by the 24 heads of lettuce found in each of the 900 cases).
7. The Notice also requests cost estimates for the maintenance of riparian vegetative cover and of riparian areas (Conditional Waiver Provision No. 39). This involves a buffer area of 30 feet adjacent to endangered bodies of water (a matter of great concern

to Jensen Family Farms since it farms land abutting the Salinas River for well over one mile as well as Quail Creek. Establishment of that buffer zone would deprive Jensen Family Farms of 20.48 acres of currently tillable land on its various ranches. That land, as set forth in Exhibit 8 hereto (which is a true and correct copy of spreadsheets prepared by me setting forth the amount of land taken on each ranch due to the loss of the 30 foot buffer zone, the per/acre value of each ranch, the rental value of each acre, taxes paid, and expenses. The total valuation of the lost acreage is, at a minimum, \$785,793.30. The costs attendant to installation and maintenance of these buffer zones on each ranch is set forth in Exhibit 9 (a true and correct copy of spreadsheets prepared by me setting forth the cost of installation (\$17,466.00), infrastructure relocation costs (\$6000.00), tree trimming (\$80,000), mowing/fire control costs (\$18,043.39), rodent/insect control stations costs (\$288.00), rodent monitoring (\$11,232.00), and a land valuation (for regulatory takings purposes) of at least \$918,637.42.

8. It is, at least for Jensen Family Farms, difficult to determine the costs attendant to individual surface water discharge monitoring and reporting as well as groundwater monitoring and annual compliance form reporting (Conditional Waiver Provisions 72, 73, 51, and 67). It is likely that Jensen Family Farms will be forced to hire at least one full-time compliance employee whose job is dedicated solely to these factors and otherwise interfacing with the regulatory requirements imposed by the Central Coast Regional Water Board. Based on best estimates, the employment cost (including health insurance, worker's compensation and other governmental levies) in these regards would be at least \$125,000 per annum. That breaks down to approximately \$100.00 per acre per year, which would have a not-insignificant price effect on both the

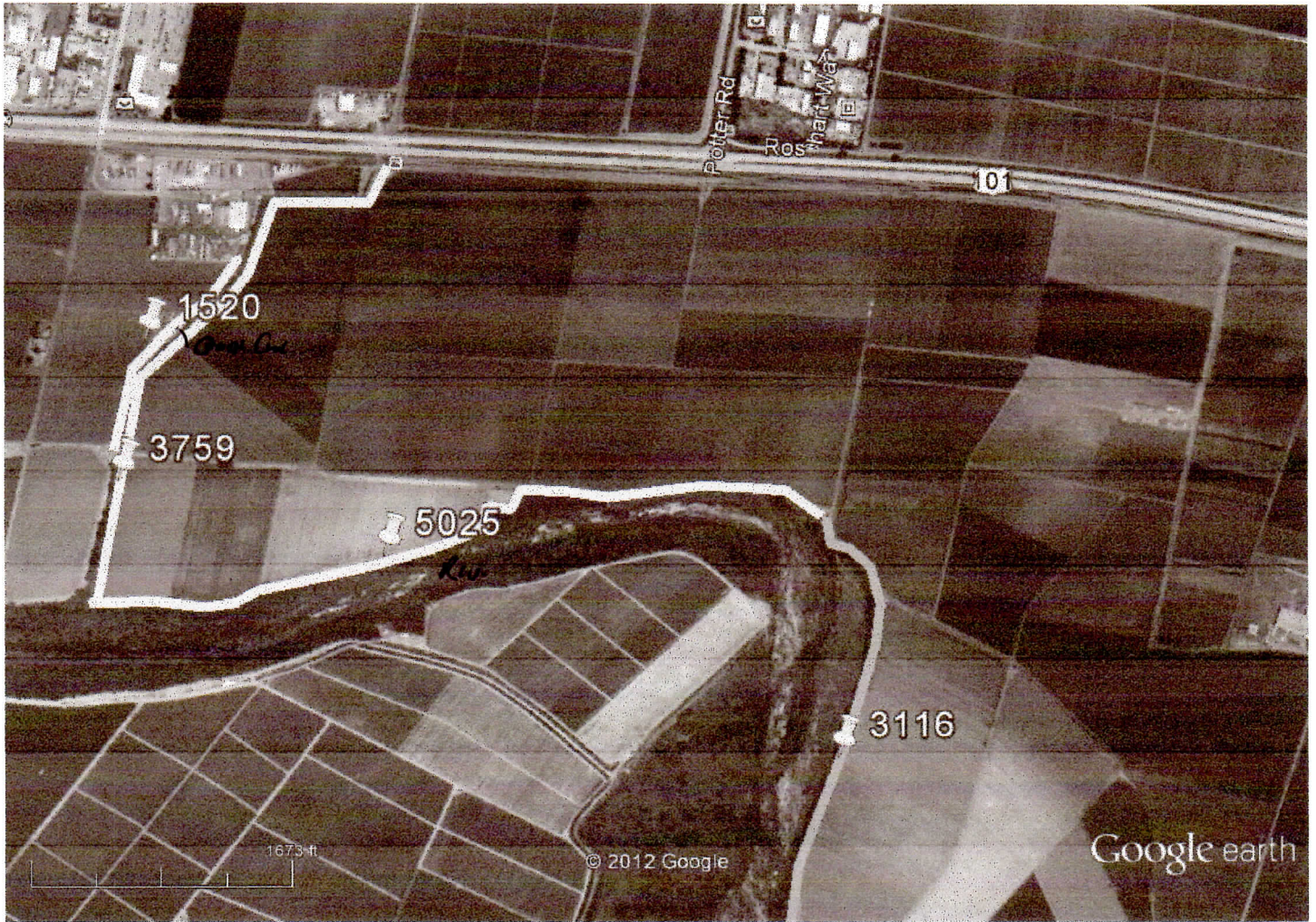
amortized cost of production and its effect on retail sales prices of lettuce and other produce and vegetables that are grown on our land.

9. The costs incident to Jensen Family Farms immediate implementation of the Conditional Waiver are significant and, in conjunction with similar costs to be borne by other farms in the Central Coast Region, are ones that are passed on and borne by the marketplace in the form of higher prices charged for produce such as lettuce and strawberries. If the marketplace is not willing to bear this increase in costs then the costs of immediate implementation are ones that must be borne by Jensen Family Farm employees (some of which may have to have their services terminated and, for that matter, individuals who would not otherwise be hired by Jensen Family Farms) and by the suppliers of various things necessary to the growing of crops (things which range from seed to fuel costs to equipment maintenance or replacement) who will see their sales decrease due to the need by Jensen Family Farms to maintain financial equilibrium.

I hereby swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge and that this Declaration was signed this 25th day of August 2012 in Salinas, California.



Ross N. Jensen

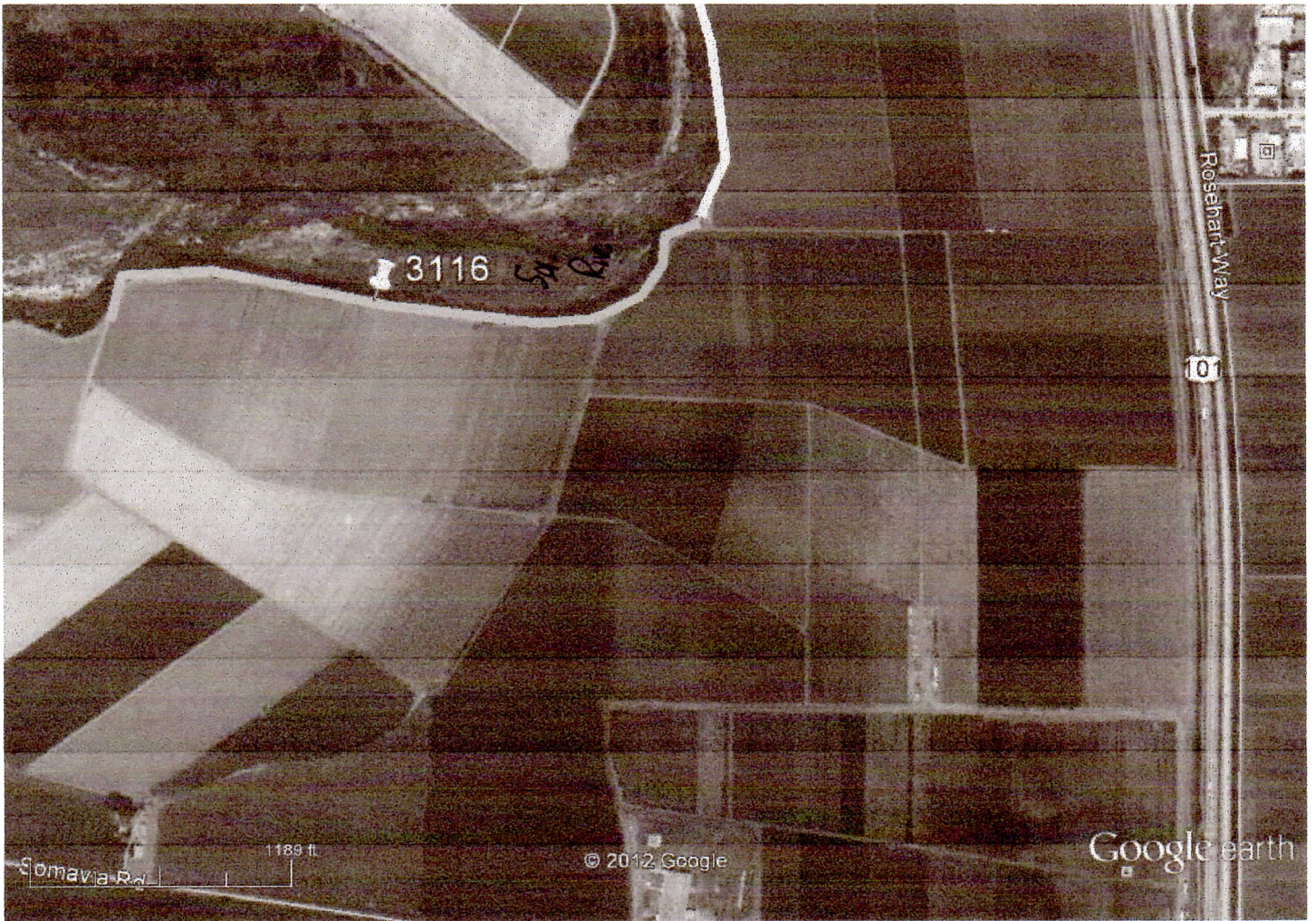


Google earth

feet
km



Exhibit 1

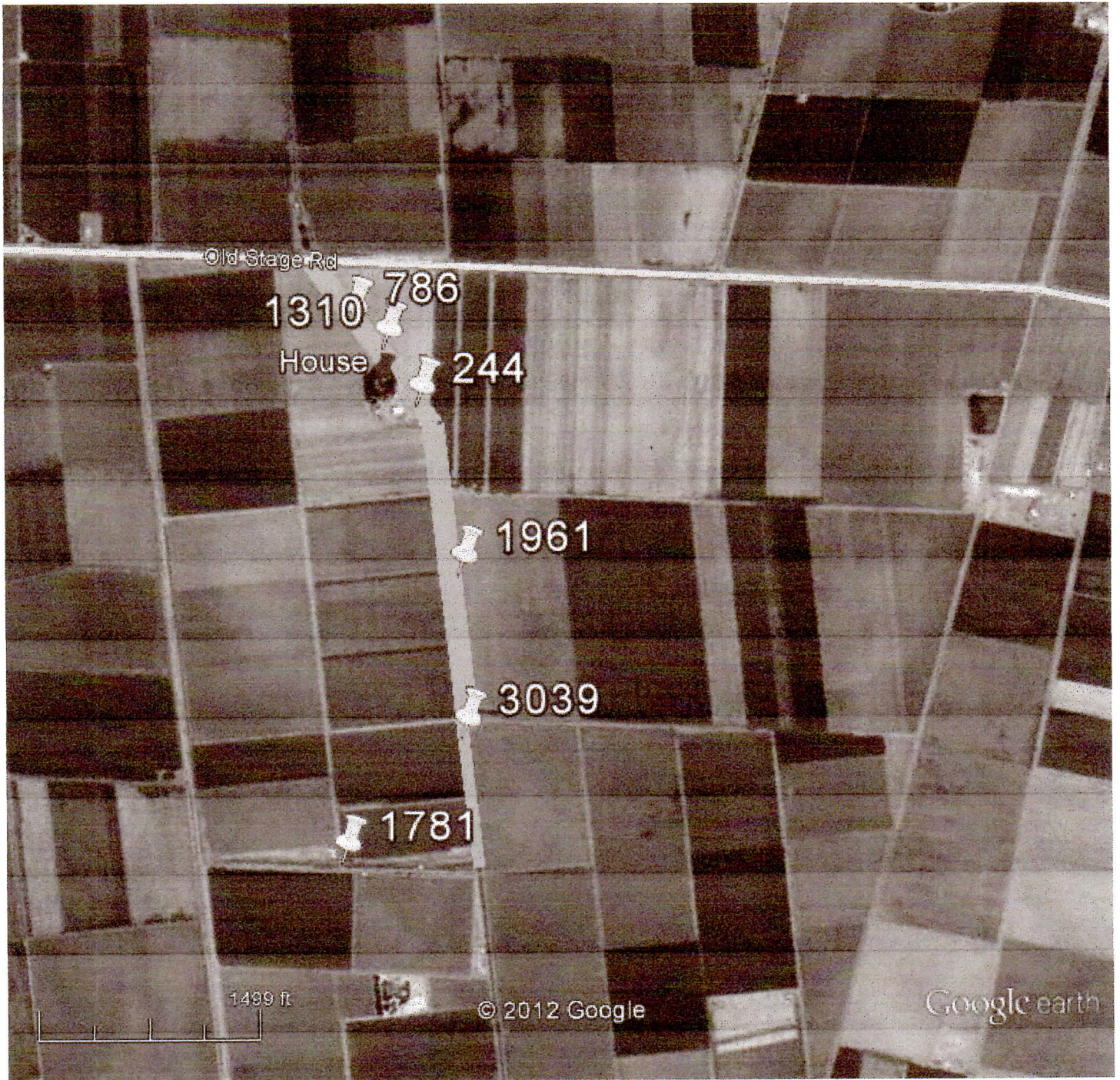


Google earth

feet
meters



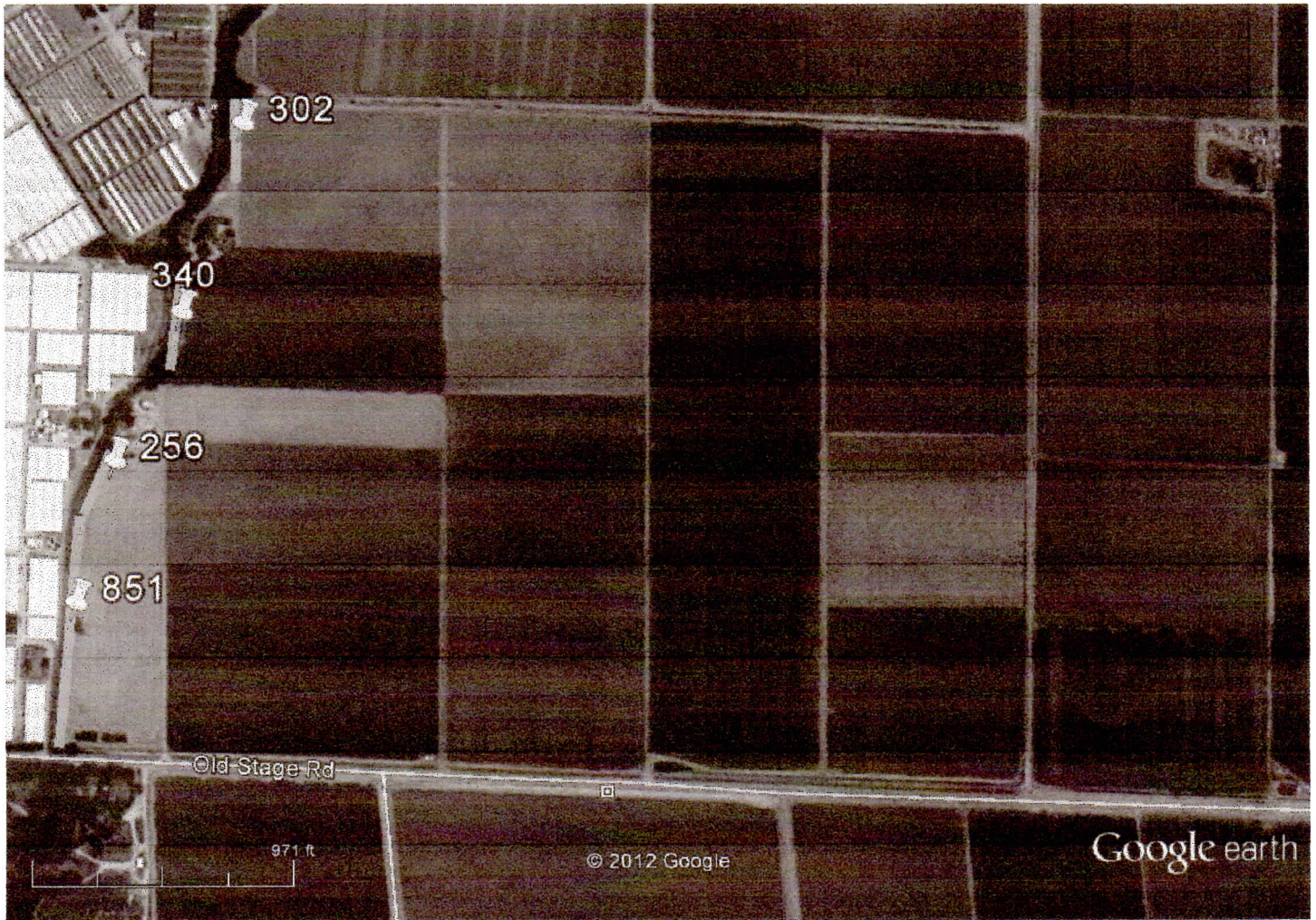
Exhibit 2



Google earth



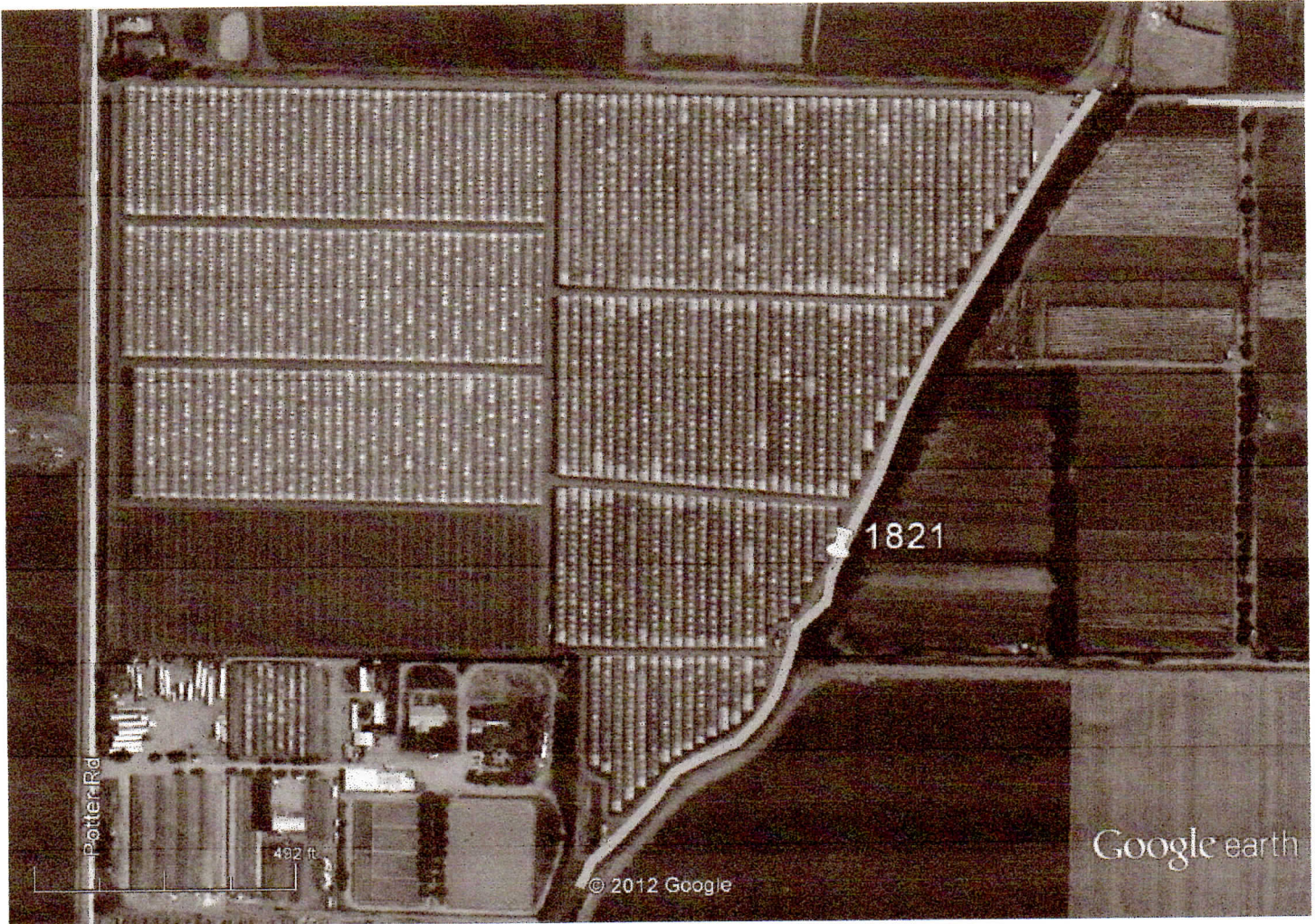
Exhibit 3



Google earth



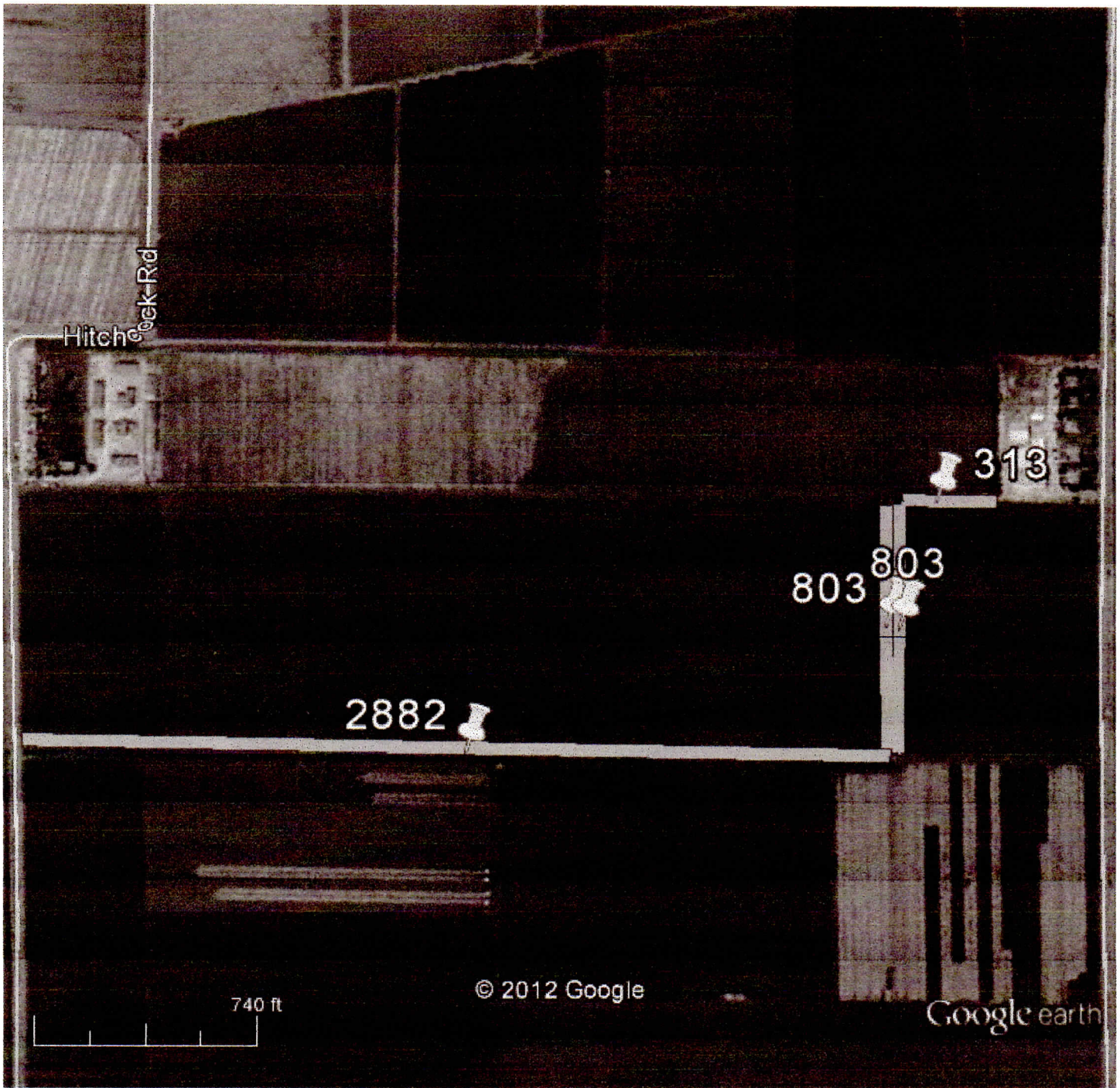
Exhibit 4



Google earth



Exhibit 5



Google earth



Exhibit 6

Ranch	Qty	Acres	Provision 31			Per Labor Cost	Cost Per Acre	Cost Per Ranch	Avg Cost Per Ranch		
			# Check Valves	Cost Valve1	Cost Valve2					Cost Valve3	
Spence #5	1	245	2	761.04	1344.98	0	1200	8.596	7594.08	3306.02	
Esperanza #1	1	400	3	2010.75	2010.75	1472.58	2100	13.735	1361.04		
Blanco #6	1	70	1	761.04	0	0	600	10.872	2710.75		
Somavia #3	1	208	1	2010.75	0	0	700	9.6671	2710.75		
Wallace #2	1	200	1	2010.75	0	0	700	10.054	2710.75		
Bundgard #4	1	39	1	2010.75	0	0	700	51.558			
Totals	6	1162	9	\$9,565.08	\$3,355.73	\$1,472.58	\$6,000.00	\$17.55	\$20,393.39	\$3,398.90	
			Rational: See Quote								
								8.60-51.56 Per Acre			
								1361.04-7594.08 Per Ranch			

Exhibit 7

Ranch	Provision 33	# Ponds	L*W*D CUFT TTL MAT	Cost Per Liner	L*W*D CUFT TTL MAT	# Ditches Lined	Liner	Cost Per Grading Permit	
Spence	Lined	0	50*106*10 0	0	1800*10*6 0	0	0		
Esperanza		4	53000	3975	108000	1	29898	\$1,809	
Blanco		0	0	0	0	0 or 1 Blanco	0		
Somavia		0	0	0	0	0	0		
Wallace		3	47500 110*20*10	4043.75		0	0	\$1,809	
Bundgard		0	22000	3900		0	0	\$1,809.00	
Totals		7	122500		108000	1	29898		At .75/SQFT No Overage
Esperanza	Pond 1						Total	\$61,829.25	
L*W*D	100*25*10		75*30*10	86*30*10	95*30*10	1800*10*6			
Liner Cost	4050		3562.5	3975	4312.5	29898	45798		
Yards	555		500	573	633	2200	4461	Yards Total	32.00/Yard
Bundgard	Pond 1						Total	6678	\$213,696.00
L*W*H	110*20*10								
Liner Cost		3900					3900		\$213,696.00
Yards		489					489		\$61,829.25
Wallace	Pond 1		Pond 2	Pond 3			Total		\$275,525.25
L*W*D	100*30*10		80*30*10	95*25*10					
Liner Cost	4500		3750	3881.25			12131.25		
Yards	667		533	528			1728		

Exhibit 8

Provision 39

Ranch	30 Ft. Buffer	Acres	Land Cost	Land Rent	Taxes	Lost Land	Rent Tax Expense Year
	Lineal Ft	Lost					
Spence #5	10304.00	7.0964	\$40,000.00	\$1,600.00	\$150.00	\$283,856.75	\$12,418.73
Esperanza #1	7340.00	5.0551	\$38,000.00	\$1,600.00	\$150.00	\$192,093.66	\$8,846.42
Blanco #6	4801.00	3.3065	\$52,000.00	\$2,000.00	\$165.00	\$171,936.64	\$7,158.52
Somavia #3	3116.00	2.146	\$40,000.00	\$1,600.00	\$150.00	\$85,840.22	\$3,755.51
Wallace #2	1749.00	1.2045	\$0.00	\$1,700.00	\$155.00	\$0.00	\$2,234.43
Bundgard #4	1800.00	1.2397	\$42,000.00	\$1,650.00	\$200.00	\$52,066.12	\$2,293.39
Totals	29110.00	20.048				\$785,793.39	\$36,707.00

Per Basin	Per Recent	Actual	Actual	Property	Actual 2012
Plan	Sale				
Minimum for					
Construction	Events	2012	2012	Taking	

Exhibit B9

Installation	Infrastructure	Tree	Mowing	Fire # Times	Rodent Insect Control Stations	Rodent Monitoring Cost	If Ruled A Taking 2012	
\$6,182.40	\$0.00	\$50,000.00	\$6,386.78		3	100.00	\$3,900.00	\$351,390.39
\$4,404.00	\$1,500.00	\$0.00	\$4,549.59		3	73.00	\$2,847.00	\$206,152.52
\$2,880.60	\$4,500.00	\$0.00	\$2,975.83		3	48.00	\$1,872.00	\$184,710.63
\$1,869.60	\$0.00	\$30,000.00	\$1,931.40		3	31.00	\$1,209.00	\$121,172.13
\$1,049.40	\$0.00	\$0.00	\$1,084.09		3	18.00	\$702.00	\$0.00
\$1,080.00	\$0.00	\$0.00	\$1,115.70		3	18.00	\$702.00	\$55,211.75
\$17,466.00	\$6,000.00		\$18,043.39		288.00		\$11,232.00	\$918,637.42

0.60 Lineal FT Labor On New Head Lands That Will Need To Be
 6*750 2*750 Valve Removal and Replacement
 Based On 1 Acres *\$300 *# Times Per Year Mowing Needed
 Based On Current Practices Used

Every 100 ft Based On Food Safety
 \$.75 Per Station Per Week Incl. Training Insurance Overhead

Total 2012 Total Total 2013 Total

	Acre 2012		Acre 2013
\$78,887.91	\$321.99	\$72,705.51	\$296.76
\$22,147.01	\$55.37	\$16,243.01	\$40.61
\$19,386.94	\$276.96	\$12,006.34	\$171.52
\$38,765.51	\$186.37	\$36,895.91	\$177.38
\$5,069.92	\$25.35	\$4,020.52	\$20.10
\$5,191.09	\$133.10	\$4,111.09	\$105.41
\$169,448.39	\$145.82	\$145,982.39	\$125.63