

Tuesday, May 31, 2016

Ms. Jeanie Townsend
Clerk to the Board
State Water Resources Control Board
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commentletters@waterboards.ca.gov



Regarding; State Water Resources Control Board's Proposed Order revising the East San Joaquin Water Quality Coalition's General Waste Discharge Requirement
RE: Comments to A-2239(a)-(c)

Dear Water Board,

We are tired. We are farmers. We work long hours six days a week. There are many days a farmer works twelve, fourteen, or more hours a day. There have been a few 24 hours plus days of work. Farmers are in their fields early in the morning till evening. Sometimes farmers work through the night.

Then after all the field work, a farmer comes home and has to do paperwork. Every year we have more forms and compliance issues. It is not unusual, for a farmer to spend his nights on paperwork.

We just had a holiday weekend. But it is not a holiday for farmers. Farms don't take holidays. Crops don't observe Memorial Day or Fourth of July. While most of the Country is celebrating, farmers are working.

I truly cannot even begin to explain how hard and many hours farmers work. We are so very tired. Every time we turn around it seems there is another regulation/requirement that we have to do. Farming is a lot of hard work, but the additional requirements are overwhelming us.

Having more reporting requirements causes a greater burden on us as farmers. The discussion of farmers is changed. Now, we talk about how much more we can take. I wonder if we are not at the tipping point, where farmers just can't do anymore.

Requiring even more reporting will cause more of a hardship to us as farmers.

Farmers will not know what their net profit is until after harvest and the crop sells. Most of the time the farmer will have a profit, but sometimes the farm loses money. Every time a new regulation is required it costs the farmer money. The fees/licenses/permits and compliance costs are a major factor to the cost of farming. The increase in these costs to the farmer over the last several years is having a cumulatively significant impact on the farm. Farmers are saying, "I don't know if I can afford to farm."

Requiring more reporting will increase the cost of farming. And farming is already perilously financially unpredictable. Every time there is another regulation it costs more money. "I don't know if we can afford to keep farming" is a real concern for us as farmers.

It is privileged information.

Farmers spend many years working with their crops. We fine tune it. What we use and the amounts is proprietor information. It is confidential information. We should not have to list our secret formula publicly. For us as farmers, it would be similar to making Coca-Cola list its formula publicly.

Farmers are already regulated.

I recall a conversation I had with someone who lived in the city and now moved to the country. She wanted to spray the weeds around her shed with Roundup. She was livid when she found out she had to go to the county and get a permit. As she said, "I can spray all the time in the city and no one cared. I move to the country and I can't even spray a couple of messily weeds around my shed. I have to go down to the county to get a permit to spray a few weeds with Roundup."

For a farmer to have a permit, he has to complete continue education hours and/or a test. Farmers also work with crop advisors. Farmers continually are educating themselves on best crop practices.

Every year about February through to the fall, when I go shopping I wonder about the city farmer/home gardener. Choose your store: Orchard, Lowes, Walmart, even some grocery stores. One will see large sections dedicated to the city farmer/home gardener. There are all sorts of items to apply to the home gardener's soil, shelves and shelves of different chemicals and fertilizers. No permit required. No training. No regulations. No reporting requirements.

I wonder, are the city farmers/home gardeners reading the package for application directions every time before the product is applied? Maybe sometimes, but probably many times they just apply it

I wonder what the cumulative affects there are with all the applications by the city farmer/home gardener.

If one group is regulated than all should be regulated.

If regulations are being required they need to be required to all. It is not right or fair to single out one group, in this case farmers. The city farmer/home gardener needs to report their usage just like the farmer.

Do you want to have what you apply at home publicly available? Will people in the city be willing to have their site specific information publicly available?

I heard a banker state, “I’ve always wondered why a person farms, long hours, hard work, and the financial risks does not justify the financial reward.” I don’t know how to reply. The banker is right. It does not make sense.

What I do know is, farmers are the ultimate environmentalist. Farmers love the land, nature, and their crop. Farmers take pride in being good stewards of the resources, like land and water, we have been blessed with. The farmers’ livelihood is dependent on our care for our land and water. We are good stewards. Our family has been part of the farming community in Merced County for over 100 years. We care for our land and environment.

Please do not this proposed order. It will hurt us as farmers. And we are already hurting so very much.

Thank you,

Colette Alvernaz,
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