



SONOMA COUNTY FARM BUREAU

3589 Westwind Blvd., Santa Rosa, CA 95403 • Phone (707) 544-5575 • www.sonomafb.org

December 13, 2017

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Dear Chair Marcus:

Sonoma County Farm Bureau, a general farm organization representing nearly 3,000 family farmers, ranchers, rural landowners and agricultural businesses in Sonoma County works to promote and protect policies that provide for a prosperous local economy while preserving natural resources and a long standing county agricultural heritage.

The proposed revisions to the East San Joaquin Waste Discharge Requirements and the impact the changes will have on the currently successful cooperative Irrigated Lands Regulatory Program, which has been in place for over a decade, are significant and costly. Given the precedential nature of the Draft Order, it will not only have a severe impact on agricultural operations within the Central Valley, but on all irrigated agricultural operations throughout the state.

The Sonoma County Farm Bureau is particularly concerned about the following:

The Draft Order includes requirements that will disrupt the existing successful irrigated lands regulatory program which has been effective in addressing surface water quality concerns and protecting water quality for years.

The cost of compliance for administration and reporting will significantly increase if the Draft Order is adopted. In addition to higher costs for individual growers, coalition/third-party costs as well as regional water board costs will increase due to the new requirements to collect and compile all raw data. Given the vast regional differences in California, one-size-fits-all requirements applicable to all areas of the state are not appropriate. The Draft Order gives direction to the Central Valley Water Board and all other regional water boards to update or develop their irrigated lands regulatory programs to be consistent.

The Draft Order requires each farm to annually monitor all drinking water supply wells on the property. This is problematic, especially because growers may not have legal authority to access landowner or tenant wells.

We also have concerns with the amount of raw data that will be submitted to the regional water boards. Not only is the amount of data reported unnecessary, the data, will now also become publicly available. Currently, third-parties submit data aggregated at the township level and maintain the raw data which is



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accessible to the regional water board if needed. This system works and doesn't expose individual farming practices to competitors or potentially cause privacy concerns.

The result of these requirements will inevitably lead to increased coalition/third-party costs and state regulatory fees, and the Draft Order does not contain any meaningful cost analysis to justify these new requirements.

The Sonoma County Farm Bureau urges you to give this issue your full and careful consideration.

Respectfully,

A handwritten signature in blue ink that reads "Steve Dutton". The signature is fluid and cursive.

Steve Dutton
President, Board of Directors