



Gary M. Sack
Regional Field Representative—North Central Region
California Farm Bureau Federation
2300 River Plaza Drive
Sacramento, CA 95833



Ms. Jeanie Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street 24th Floor
POB 100
Sacramento, CA 95812

RE: Comments to A-2239(a)-(c)

May 18, 2016

Dear Chair Marcus and Members of the Board

I am a Regional Field Representative for the California Farm Bureau Federation. My territory encompasses 15 counties in North Central part of the state. Many irrigators in my territory are concerned about the new “one size fits all” proposed order by the State Water Resources Control Board. I also attended the Sacramento workshop on May 4 and listened to testimony by panels of Regional Water Boards, working groups, and other farming leaders who solidified the observation of others. Their concerns are:

1. The farm community has been working hard to make the Irrigated Lands Program work. They have spent millions of dollars complying and received no credit for their hard work or success of their programs.
2. Farmers and ranchers are extremely concerned about their ability to successfully operate with new, increased costs, and liability that the Board would be placing on them by making information public so that environmental activist groups could have access for potential lawsuits or protests. The environmental activist groups have not been part of the solution. Farmers also have personal safety concerns when information becomes public.
3. Field specific data is of concern, in addition to the privacy concerns, because of the cost to accumulate the data. The township data has been sufficient, especially since the raw data is accessible to the Regional Board, if needed.
4. I heard the Central Valley Water Board testify that the proposed order would increase its cost of staffing from 18 to 99—that’s a five-fold increase! Farmers end up paying for that increase.

5. Coalitions may fold if the new orders are put into place, because the proposed order undermines the benefit and usefulness of the coalitions, which have been immensely helpful to farmers.
6. Many people testified that a uniform “one size fits all” approach makes no sense, since soil conditions, vulnerability conditions and other conditions are very different.
7. Scientists refuted the benefit of the nitrogen application requirements (The A/R or amount applied divided by the amount removed). This adds significantly to farm operation reporting, such as crop yield, which should be proprietary data.
8. There was also significant testimony, which reconfirmed comments that I have heard in the field on the difficulty to monitor drinking water wells, particularly those wells that operators may not have authority to access.

California’s family farmers and ranchers agree with the sentiments that we want to do what we can to keep water clean, and not to over-apply materials. Farm families and their employees drink the water, too. We have a program that is working. Coalitions have been formed, farmers belong to those coalitions, and testing has demonstrated its effectiveness.

We support the current program in place. Radical changes to the program, will hurt family farmers.

It is interesting, that legislators and regulators all agree that we like family farmers and locally produced food; but they continue to enhance regulations and costs to the point that they are running those farmers out of business. When our food no longer becomes locally produced, and we have to rely on China and other foreign countries for our food supply, it will be too late to support family farmers. We have the most stringent pesticide laws in the world, when we depend on foreign countries for our food, they will say, “take it, or leave it.”

I urge you to scrap the proposal and continue with the current program that is working.

To modify a cliché, *“Don’t throw the farmers out with the irrigation water.”*

Sincerely,

Gary Sack
Regional Field Representative
California Farm Bureau Federation