



# CALIFORNIA FARM BUREAU FEDERATION

OFFICE OF THE GENERAL COUNSEL

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August 16, 2013

Dr. Jelena Hartman  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670-6114

***Re: Comments on the Draft Templates for Farm Evaluation, Nitrogen Management Plan, Nitrogen Management Plan Summary Report, and Sediment and Erosion Control Plan***

Dear Ms. Hartman:

The California Farm Bureau Federation (“Farm Bureau”) is a non-governmental, non-profit, voluntary membership California corporation whose purpose is to protect and promote agricultural interests throughout the state of California and to find solutions to the problems of the farm, the farm home, and the rural community. Farm Bureau is California’s largest farm organization, comprised of 53 county Farm Bureaus currently representing more than 74,000 agricultural, associate, and collegiate members in 56 counties. Farm Bureau strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California’s resources.

Farm Bureau appreciates the opportunity to provide comments on the Draft Templates for the Farm Evaluation, the Nitrogen Management Plan, the Nitrogen Management Plan Summary Report, and the Sediment and Erosion Control Plan. Farm Bureau understands the rationale for requiring standardized information through the use of uniform templates. (See Western San Joaquin River Watershed Draft WDR, p. 31, requiring all coalitions and commodity groups to use the templates provided by the Regional Board in order “to collect information consistently across irrigated agricultural areas and commodities and to minimize the costs for growers to provide that information.”) Notwithstanding the benefits from uniformity, Farm Bureau respectfully requests that the templates allow for flexibility and variability so that coalitions can appropriately tailor the templates depending on the geographic area, elevation, existence of groundwater basins or sub-basins, soil content, presence of fractured rock, types of

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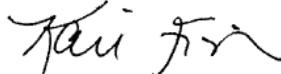
CARL G. BORDEN • KAREN NORENE MILLS • CHRISTIAN C. SCHEURING • KARI E. FISHER • JACK L. RICE

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commodities grown, known water quality impairments, the propensity to impact water quality, and the size and scale of farming operations, for example. Such tailoring will allow the Regional Board to obtain the most relevant information specific to the area being regulated while also allowing growers to minimize costs and maximize benefits.

Thank you for the opportunity to provide our comments. We look forward to further involvement and discussion with the Regional Board on the templates and the development of the Long-Term Irrigated Lands Regulatory Program.

Very truly yours,



Kari E. Fisher  
Associate Counsel

KEF:pkh