

Smith, Megan

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**From:** Patricia L. Stever [pstever@tulcofb.org]  
**Sent:** Friday, 24 September 2010 12:52  
**To:** ILRP Comments  
**Subject:** ILRP Comments - TCFB  
**Attachments:** 20100924124847000.pdf

Please find attached comments from the Tulare County Farm Bureau.

Thank you.

Tricia Stever,  
Executive Director  
Tulare County Farm Bureau  
559-732-8301



# TULARE COUNTY FARM BUREAU

*Mission: to promote and enhance the viability of Tulare County agriculture.*

September 24, 2010

Ms. Megan Smith  
630 K Street, Suite 400  
Sacramento, CA 95814

RE: Central Valley Regional Water Quality Control Board draft PEIR and ILRP Comments

Ms. Smith,

The Tulare County Farm Bureau appreciates the opportunity to submit comments on the Central Valley Regional Water Quality Control Board Irrigated Lands Regulatory Program (ILRP) Draft Programmatic Economic Impact Report (PEIR) and Economic Analysis.

The Tulare County Farm Bureau [TCFB] is a non-governmental, non-profit, voluntary membership association whose purpose is to protect and promote agricultural interests throughout Tulare County and to find solutions to the problems of the farm, the farm home and the rural community. TCFB 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. TCFB represents over 2,500 member families in Tulare County.

In reviewing the PEIR and the five outlined alternatives, proposed alternatives 2, 3, 4 and 5 will present additional increased and unnecessary regulatory burden on agricultural landowners and farm businesses in the CVRWQCB region. These plans have the potential to increase costs, all of which will be funded by fees paid by the participants, with a staggering increase in costs nearing a 90% increase over the current program.

It did not appear that the Staff Preferred Alternative was included in the PEIR and so we are unable to evaluate the alternative's impacts on agriculture including increased and unnecessary regulatory burdens and economic costs.

The Economic Analysis estimates it will cost a farmer thousands of dollars to characterize surface and groundwater quality for low impact areas. This does not include cost for water quality testing. This particular figure represents a disproportional cost to smaller farmers. In this current depressed economic environment, these costs, as well as those mentioned above, are unrealistic and not warranted to maintain surface water monitoring.

Through discussion with other agricultural organization, including the California Farm Bureau Federation, it is important to bring attention to the Economic Analysis. Monitoring costs in this portion of the document are grossly underestimated. Furthermore, these costs vary between regions of California further varying the costs associated with the program. This makes it very difficult to really get a clear understanding of what the potential cost will be to farmers.

TCFB believes that the work of monitoring and reporting needs to remain with the Coalitions as the third-party lead entities. These organized groups best understand the farmers with whom they work with and are best equipped to maintain reporting to the CVRWQCB. There is no need to create a new system of procedures and policies for reporting and organization when the current system in place works and has proven effective. It would be financially prudent to make the current system of coalitions work to accomplish the Goals and Objectives of the ILRP. It is our opinion that this recommendation can best be accomplished by adopting alternative number 2 as presented in the PEIR.

Again, we appreciate the opportunity to submit our comments on the ILRP.

Sincerely,

Patricia L. Stever  
Executive Director