



GLENN COUNTY FARM BUREAU

831 5th Street • Orland, CA 95963 • (530) 865-9636 • Fax (530) 865-7182
E-mail: glenncfb@sunset.net

IL126.

September 24, 2010

Pamela Creedon, Executive Officer
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive
Rancho Cordova, California 95670-6114

RECEIVED
SACRAMENTO
CVRWQCB
10 SEP 27 PM 2:24

RE: Comments on Long Term Irrigated Lands Regulatory Program

Dear Executive Officer Creedon:

The Glenn County Farm Bureau Board of Directors representing over 800 farm and ranch families in cooperation with the Colusa Glenn Subwatershed Program have compiled the following comments and suggestions in regards to the *Programmatic Environmental Impact Report (PEIR), Recommended Program Alternative (Recommended Program), and Technical Memorandum Concerning the Economic Analysis of the Irrigated Lands Regulatory Program (Economic Analysis)* released on July 28, 2010.

GCFB Directors would like to start by thanking you for providing us with your proposal in advance; this is an opportunity we greatly appreciate. The GCFB Board of Directors supports the comments and recommendations submitted by the Colusa Glenn Subwatershed Program. Here are a few of the that concern GCFB.

- This program is a major expansion from the current ILRP, and greater financial burden will be placed on the agriculture community.
- The cost to administer the program can range from approximately \$4,000,000 to \$66,000,000.
- The recommended program will have disproportional impact on smaller farming operations/landowners and some crop types.
- Concerns about the estimated cost for monitoring, they appear to be underestimated, resulting in future increased cost to agriculture.
- It is difficult to determine how the results in the Economic Analysis were arrived at.
- Monitoring every 5 years seems like an unnecessary process unless there is significant increase or change in the agricultural practices. In subwatersheds with little acreage or few members monitoring, even every 5 years is expensive.

The GCFB would like to encourage the Regional Board to consider the size of the Central Valley region and take into consideration the current groundwater data prior to

adopting new regulations. This way necessary action and further monitoring can take place where needed and as needed.

Again, we thank you for providing us with this opportunity. The GCFB strongly encourages you to take these comments, and suggestions into consideration. Agriculture is a major factor in California's economy, in our nation's security, the economic lifeblood of many communities in the Central Valley, as well as many other important facets of our communities. Please contact the GCFB office for further questions (530)-865-9636.

Sincerely,

A handwritten signature in cursive script that reads "James A. Jones".

Jim Jones, President
Glenn County Farm Bureau