



August 7, 2014

Agricultural Expert Panel  
c/o Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

**RE: Draft Conclusion of the Agricultural Expert Panel**

Dear Dr. Charles Burt, Chair, and Members of the Agricultural Expert Panel:

I am writing on behalf of Western Growers Association to give our comments regarding the draft report *Conclusions of the Agricultural Expert Panel: Recommendations to the State Water Resources Control Board pertaining to the Irrigated Lands Regulatory Program*. Western Growers members are family farmers within California and Arizona who supply people with the best medicine in the world- fresh produce. Our members grow fruit, vegetables, and tree nuts that are essential to a healthy life.

Over the past decade, Western Growers has been an actively-involved stakeholder in the establishment and implementation of the Statewide Irrigated Lands Programs. We appreciate the opportunity to be engaged in this planning process and would like the following comments to be taken into consideration for the final report.

**1) Coalition approach**

Western Growers strongly supports the coalition approach to regulating irrigated agriculture. This is the preferred reporting method for growers as it is more cost-effective and provides privacy protections. Coalitions ensure successful compliance and standardization of reporting.

**2) Minimized individual grower reporting**

Detailed individual reporting by growers is impractical at the regulatory level. Individual reporting is data-intensive and expensive to collect, while failing to provide significant insight, as the individual data is crop-specific and difficult to compare. Coalition reporting, however, provides standardized, aggregated data that can be meaningfully interpreted in order to comprehensively address the objectives and goals of the Regional Water Boards.

**3) Grower education**

We agree that education for growers is one of the most meaningful ways to ensure that all growers are informed about and are implementing the current best management practices in order to reduce impaired or excessive discharge.

Western Growers also supports comments provided concerning this draft by various Central Valley and Central Coast grower groups.

If you have any questions concerning our comments, please do not hesitate to contact me.

Best regards,

A handwritten signature in black ink, appearing to read "Gail Delihant". The signature is written in a cursive, flowing style.

Gail Delihant  
Director, CA Government Affairs

Cc: Members of the Agricultural Expert Panel