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On behalf of the PNSSNS Subwatershed Board of Directors, the purpose of this flyer is to spread the word about 1) the long-term Irrigated Lands Regulatory Program (ILRP) and 2) the Governor's proposed budget that includes Ag-Waiver Fee increase. Both issues may dramatically increase costs to farmers, ranchers and those working in the agriculture industry.

The long-term Irrigated Lands Regulatory Program (ILRP) which is the future of the existing water quality program held under the Central Valley Regional Water Quality Board (RWB) must go through the Programmatic Economic Impact Report (PEIR) process. Through the PEIR process, it is mandated that the RWB hold Public "Input" Workshops and accept comments to gain public input. The RWB will accept written comments until **Sept 27, 2010**.

Enclosed is a letter written to the RWB. Please sign and send as soon as possible before the **Sept 27th** deadline. Feel free to edit or add your own points. Many of you have compelling individual economic struggles and program costs-to-date that would help shed light on the impacts of the costly ILRP program to individual family ranches and our rural communities as a whole. Below are a few listed points with which multiple coalitions and Ag interest groups agree.

- The Recommended Program Alternative for the Long Term ILRP represents a significant expansion of the programmatic requirements on family farmers, placing increased cost burdens on Sacramento Valley agriculture that bear no relationship to need for protection of water quality.
- The RWB estimates in the PEIR that their costs to administer the program will range between approx. \$4,000,000 to \$66,000,000 depending on the alternative selected. Upwards of 97% of these costs would be funded by agriculture thru acreage fees assessed by the RWB.
- The Recommended Program will have a disproportional impact on smaller farming operations and some crop types. The *Economic Analysis* estimates it would cost a grower \$5000 to characterize surface and groundwater quality for low impact areas **in addition to costs for water quality testing**.
- Groundwater quality in the Sacramento Valley is very good with few problems associated with agriculture. There are several state programs monitoring and protecting groundwater already. To duplicate these efforts is wasteful of our money. Coordination among existing programs with sharing of data is the prudent course of action.
- First encounter of ground water is defined as groundwater that needs to be protected even though there are areas where first encountered ground water is not and has never been usable water for drinking or agriculture use.
- The assumption that the act of irrigating a crop is considered a discharger to groundwater that causes the degradation of groundwater is not provable or plausible in many areas of the State. Many areas throughout the state are irrigated and do not discharge to groundwater.
- There are many flaws and fundamentally wrong assumptions in the Economic Analysis. Monitoring costs are underestimated and changes in the underlying assumptions will result in substantial increase in the costs to agriculture.

SAY NO to the Ag Waiver Fee Increase

The PNSSNS Board of Directors urge you to oppose the 400% Ag Waiver water quality fee increase proposed in the Governor's 2010-2011 budget. With 30,000 irrigated acres covered in the PNSSNS Subwatershed Group, the current rate of 12 cents/acre equals \$3,600 for the entire group. The proposed increase to 49 cents/acre will boost PNSSNS costs to \$14,700 for the State Fee portion of the costly ILRP. Over the past six years, approximately \$300,000 has been drained from our Ag community for this program. Moreover, this cost burden bears no relationship to need for protection of water quality.

Since the inception of this program six years ago, PNSSNS has paid as high as \$67,000 to meet annual water monitoring and reporting requirements. Considering the fact that the monitoring data showed only one exceedance attributable to agriculture (in 2005), this is an expensive program for small farmers and ranchers that make up the PNSSNS membership. Five years of follow up tests reveal the problem has been remedied.

The recent State Budget with the Ag Waiver Fee did not get the needed 2/3 vote. We need to remind our District Reps to stand firm on this, as it will come up again soon, and we want to have a pile of comment letters in front of our policy makers prior to that time. If you have not sent, called, faxed or emailed your legislators yet, go to www.cleanwaters.info, print the letters, and contact your legislators.

Feel free to call or email me with any questions. Let's be heard loud and clear....

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