

Chairman Wright and Members of the Board

I am Eric Larson, Executive Director of the San Diego County Farm Bureau

I want to start by acknowledging the excellent cooperative relationship we feel has been established with your staff, particularly with Mr. Pete Peuron.

When the Conditional Waiver for Agricultural and Nursery Operators was adopted by this board in October 2007 our organization took it upon itself to investigate several of the agricultural monitoring groups that were already functioning in the state. It became obvious to us that the formation of a monitoring group in this region would require us to accept the leadership role.

With thousands individual farming operations in Region 9, we knew this would be a monumental task and an early start would be critical in order to meet the statutory reporting deadlines set in the waiver.

In July of last year the Farm Bureau board of directors set the formation of the San Diego Region Irrigated Lands Group in motion.

In September letters were sent to approximately 3500 agricultural operators who could be identified through our membership roster and publically available lists. We also sent notification through packing houses, grove managers, and other trade associations.

These letters announced the formation of the monitoring group and invited the farmers to enroll.

In early December a second round of notifications were sent.

As a result of our effort we have enrolled approximately 1100 farms representing nearly 34,000 acres of irrigated agriculture. By our estimation we have enrolled less than one-quarter of the farms, but nearly one-half of the irrigated acreage in the region.

We are now preparing for a third round of recruitment that will begin next month.

Concurrent with the enrollment process we are filing the appropriate documents to incorporate the monitoring group as a California 501(c)(3) non-profit organization.

We are doing this based on legal advice and the model of several other monitoring groups.

An important next step for us will be the retention of an experienced firm that will assist in the filing of our Notice of Intent and development of the Monitoring and Reporting Program Plan and the Quality Assurance Program Plan as required by the waiver.

Creating the monitoring group has definitely brought a number of challenges.

First, Farm Bureau has had to invest an inordinate amount of time to this project with more than 900 hours spent on the project to date. For a four-person office, that has strained our resources.

What is proving to be the greatest obstacle is proving to be finding and enrolling the large number of small farms in the region. We have concluded that as many as 1000 do not appear on the membership roles of any organization nor are they on any list available through public agencies.

The portion of southern Riverside County included in Region 9 has proven to be a problem. There seems to be no sense of urgency to comply with the waiver in that area and we have failed to gain endorsement for our effort from the Riverside County Farm Bureau. At this time we are not soliciting participation in Riverside County. Southern Orange County is a different situation. We are active there with the Orange County Farm Bureau's support.

Another challenge we had was recently remedied by the news that the Regional Board has begun notifying agricultural operators of the mandate for joining a monitoring group or enrolling as an individual discharger.

To be perfectly frank, there are a large number of farmers who have not been compelled to enroll in our monitoring group based on our message alone. It is our hope that your effort will be sustained and includes a strategy to find and notify the large number of yet unidentified small farms.

The final issue we are dealing with appears to have no remedy. We have heard from many part-time farmers - and I should point out that San Diego County has more part-time farmers than any other county in the nation - that the monitoring mandate and its associated costs coupled with water use restrictions may cause them to abandon their farming operation.

At this time the biggest unknown for us is the cost of monitoring and reporting. We expect to have enrolled farms in ten of the eleven watersheds that you regulate. Multiply that by the yet-to-be-determined number of monitoring stations per watershed and the several constituents expected to be tested for in each sample, and we assume the annual cost for this effort will be very expensive and a burden for the participants.

As we look forward we expect to complete our enrollments by the middle of next year in order to afford us ample time to prepare all the information about the individual enrollees required to be submitted in the Notice of Intent

I'll conclude by mentioning that while we have heard some talk about the formation of other monitoring groups, we are not aware of any others that have organized.

Thank you.