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DEPT. OF FOOD AND AGRICULTURE

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Serving Riverside County Agriculture Since 1917

January 27, 2012

Paul Wenger, President
California Farm Bureau Federation
2300 River Plaza Dr.
Sacramento, CA 95833-3239

Re: Evaluation of Increased Use of Reclaim Water on Crops

As you may know, the Western Municipal Water District ("Western") terminated water service and removed the meter from the fields of one of our members, Andy Wilson, last December. Western recently expanded its industrial reclaim system and had over capacity. Its solution was to replace deliveries of untreated Colorado River Water with tertiary treated influent. Many of our citrus farmers were coerced by Western to accept the reclaim water and reluctantly agreed to accept the water to avoid shut off. The Wilsons did not. Two days before Christmas, Western pulled their water meter. We are having a particularly dry winter in Riverside County so Western's actions will have an immediate impact on at least this one farmer who has a significant investment in his permanent crops. Under Western's regulations, farmers must accept reclaim at their own risk to crops.

The University of California, Riverside, has concluded that high levels of boron in the reclaim water threatens citrus and avocado crops and that anything over .17 ppm poses a significant, long term risk. Western claims that .33 ppm is safe. Aside from boron, we also understand that Western's industrial reclaim water potentially contains other chemicals, such as perchlorate, and salts that are not being sampled or treated in the system.

This is an issue of state-wide concern. Use of reclaim water on crops is relatively new and will likely increase as water becomes more expensive. Farmers, on the other hand, have long-term investments in their crops that they cannot risk that reclaim water on their crops will not cause damage.

Here are some areas where the California Farm Bureau Federation (CFBF) and the California Department of Food and Agriculture (CDFA) can lend critically needed support to our members. First, we need to know what rights our members have to decline substitute water when there is incomplete science on its safety. Second, we need the CFBF to support regulation at the CDFA and the State Water Board that puts the onus on the water districts to fund geographically specific studies before they use replacement water absent an emergency. Third, we need the CFBF to request that scientists at the CDFA (and various water boards) evaluate whether the

current levels of toxins in industrial reclaim input waters are safe – not only from a health perspective – but because long-term accumulation of salts and soil will make farmland unproductive and affect our domestic food supply.

Finally, we need a commitment from the water agencies to work with the CFBF and CDFA. The approach Western should be taking is to test more frequently and at the meter to demonstrate the actual levels being received will not damage citrus or avocado trees.

Western's heavy handedness in the face of objective university research sends a strong message to agriculture that it need not be concerned about our economic investments.

On behalf of the Riverside County Farm Bureau, I want to thank you for your time and concern. We look forward to your reply

Sincerely yours,

Grant Chaffin, President

CC: RCFB Board
Paul Wenger CFBF
Joshua Eddy, CDFA
Craig McNamara, Sierra Orchards
Andy Wilson