



KIRSCH

Family Farms, Inc.

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DEQ

MAR 15 2011

Water Quality

March 14, 2011

Andrea Matzke
Oregon Department of Environmental Quality
Water Quality Division
811 SW 6th Ave.
Portland, OR 97204

Dear Andrea Matzke,

I am a third generation farmer in St. Paul, Oregon. I have been farming with my family full time for five years. Although I haven't been farming full time for very long, I have witnessed my family as we have adapted to different regulations by many different organizations. Changes have been made, not always because we were forced to by regulations, but many times because we feel they are important because as farmers we are truly the stewards of the land.

We currently farm along side the Willamette River and Champoeg creek. Both of these water ways are very important to both irrigation and fish in our area. Because of this we have always had large buffer zones around our water ways. The Willamette buffer zone is more than 50 feet of natural grasses, plants and trees that help to filter any chemicals that may escape into that area. I do have to also mention that because of the type of cropping that we do, mainly perennial crops, these alone also help with the filtration starting from the field and working out.

Another technique that we have started to utilize in the past few years is no-tillage planting. In our fields that border water-ways there is also usually a rather steep slope. To reduce the erosion of the top soil, which could fill up those creeks with dirt over time, we no-till in those areas so as to not disturb the soil and keep the ground more solid. Along with this we use hay bales to reduce the damage that water can do, even in no-till situations to reduce that top soil run off.

Our newest project is one that we hope will be installed this next year. We are purchasing a linear irrigation system to use on our farm. A system like this, although very costly to put up, will increase our efficiency from 65% with hand lines, 70% with wheel lines, up to 80% water efficiency. We are hoping to use this new system not only for watering our crops, but also for fertigation and chemigation that will further increase

our ability to get our chemicals where they are needed and at the correct time. All while reducing drift and truly hitting our target with the chemical.

Working in agriculture, I strongly support the current SB 1010 regulatory procedures enacted in 1993 by then Governor John Kitzhaber. The current mandatory regulation conducted by the Oregon Department of Agriculture is a collaborative effort that works continuously to manage conditions on agricultural land to improve Oregon's water quality. DEQ maintains it has no intention of disrupting the 1010 process, however, the language they propose in this rulemaking indicates their goal of direct regulation over Oregon's farms. Also, DEQ provides no safe harbor for landowners who comply with DEQ mandates and numeric water quality standards are not achieved. Please reconsider the language proposed as it will gravely affect all the hard work accomplished by agriculture through the 1010 process.

As you can see we are doing what we see as economically feasible, while at the same time increasing our efficiency as much as possible. We are doing our best to take care of the land, it is our livelihood and a part of my life that I hope to pass on to my children like my father was able to do for me. I feel as though this opportunity however would be challenged by the new water quality standards that have been proposed by DEQ. We need to use ODA for any regulation or enforcement of farming practices. We are already doing our best to do everything economically possible to comply with regulations that are currently in place and I plan to continue to do that because it is what is best for our farm land. However I am suspect of the EQC coming in and putting unreasonable and economically inefficient rules to regulate my farm right out of business. I also support the formal comments and suggested rule language changes submitted by the Oregon Farm Bureau.

Thank you,



Brenda Kirsch
Kirsch Family Farms, Inc.
St. Paul, OR