

Ms. Jeanie Townsend
Clerk to the Board
State Water Resources Control Board
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RE: Comments to A-2239(a)-(c)

Dear Chair Marcus and Members of the Board:

I am a farmer who grows vegetables in Monterey County, California. I have been following the State Water Resources Control Board's Proposed Order revising the East San Joaquin Water Quality Coalition's General Waste Discharge Requirements, and I am concerned that my ability to continue to farm will be unnecessarily negatively burdened by the Proposed Order.

The proposed revisions to the East San Joaquin Waste Discharge Requirements and the potential impact the changes will have on the already successful cooperative Irrigated Lands Regulatory Program, which has been in place for over a decade, are significant and costly. Given the precedential nature of the Proposed Order, it will not only have a severe impact on agricultural operations within the Central Valley, but throughout the state.

Although I can understand the need for a more aggressive approach to programs dealing with nutrient applications, it cannot be a "one size fits all" approach. For instance, nitrogen removal estimates for most of our vegetable crops in the Salinas Valley haven't been established yet. Many times crops are left in the field for a host of reasons, (market conditions, food safety, quality, etc.)

We have been following an aggressive program of nitrogen applications on all of our crops that was never even conceived of years ago. Our groundwater nitrate problem was conceived many years ago, (as it may take decades for nitrate to filter through to groundwater aquifers) and now with our knowledge of what has occurred, we have responded without hesitation. Now is the time to encourage a partnership with the farming community with continued education and sound science. The proposed program will throw up unnecessary roadblocks in our paths to success.

Thank you for considering my views.

Respectfully submitted,

Bob Martin
Gen. Mgr., Rio Farms
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