

# LARSON RANCH

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REC

DEC 04 2017

DIVISION OF WATER QUALITY

December 1, 2017

State Water Resources Control Board  
Cal/EPA Building  
1001 I Street  
Sacramento, Ca 95814

Re: State Water Board Draft Order for East San Joaquin Water Quality Coalition's  
General Waste Discharge Requirements

Members of the Board:

I am writing in protest to your proposed Draft Order referenced above. As a current member of the East San Joaquin Water Quality Coalition, I would like to point out that the data I have seen regarding waste discharge and excess nitrogen have all indicated that coalition members have been successful in reducing these items by a significant amount.

As a ten year grower of a 40 acre block of almonds, I have installed micro irrigation to reduce the possibility of nitrogen flushing into ground water aquifer. I also take leaf sample twice a year to determine the levels of nitrogen needed as well as any other nutrients needed to produce a successful crop. I furnish the Coalition with my nitrogen use via a nitrogen budget developed by the Coalition and now incorporated with the California Almond Board Sustainability Program (of which I am a participant). From what I can determine, the water board is trying to reinvent an already successful program and in doing so will cause a great deal of coalition cost increase and confusion as to what rules growers are supposed to use for our future budgeting, disrupting an already successful program. By requiring all management and nitrogen

application information to be publicly reported on a field level basis would create an undue hardship on small growers like myself.

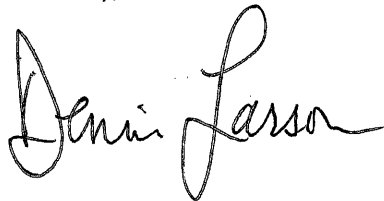
Furthermore, nitrogen application and drinking water supply wells sample data would expose small growers to frivolous lawsuits.

If your goal is to eliminate the small farmer from the agricultural world, this is a great way to go about it. Keep pouring on the regulation, subject us to litigation we can't afford and force us into bankruptcy.

At 71 years old, this is my retirement. I chose to work long hours, multiple days a week and I put my entire retirement savings on the line when I began farming because I love working the land and producing a healthful food product.

Please reconsider your draft proposal. You are trying to fix something that isn't broken.

Sincerely,

A handwritten signature in black ink that reads "Dennis Larson". The signature is written in a cursive, flowing style.

Dennis Larson

4150 Saylor Rd

Denair, CA 9531