



Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor [95814]  
P.O. Box 100  
Sacramento, CA 95812-0100  
VIA EMAIL: [Commentletters@waterboards.ca.gov](mailto:Commentletters@waterboards.ca.gov)

May 29, 2016

RE: "Comments to A-2239(a)-(c)" – State Water Board Review of WDRs General Order [No. R5-2012-0116] for Growers within the Eastern San Joaquin River Watershed that Are Members of the Third-Party Group (the Eastern San Joaquin Water Quality Coalition)

Ms. Townsend and State Water Board Members:

My name is Dennis Johnston and I am a partner of Johnston Farms located in the Edison area of Kern County and we farm 3200 acres of potatoes, citrus, bell peppers, carrots and wheat. I am also a board member of the Kern River Watershed Coalition Authority (KRWCA).

After years of work and expense, the KRWCA and the other members of the Central Valley Regional Water Quality Control Board (CVRWQCB) came up with reporting tools such as the Nitrogen Management Plan and the Farm Evaluations that are straight forward and easy to use. Now, before we have completed even the first cycle of reporting using these tools your board is proposing to change the reporting methods that would require much more work and would not give you any better information than the reports we have worked out. I have personally (along with my Certified Crop Advisor) completed last year's NMP and Farm evaluations and found the process to be fairly easy and straight forward. I would recommend allowing the farmers in the CVRWQB to continue with the current reporting tools for a few years and seeing if the reporting is adequate. Then if you are not pleased with the results then we can adjust the format at that point. It seems to me that complicating the reporting process will actually result in less accurate information reported to you.

Kindest Regards,

Dennis Johnston