

commentletters

From: Ellen Fickewirth <fickewirthe@hotmail.com>
Sent: Tuesday, May 03, 2016 7:59 PM
To: commentletters
Cc: Lesa Osterholm
Subject: Comments to A-2239(a)-(c)



May 3, 2016

Ms. Jeanine Townsend
Clerk of the Board

State Water Quality Control Board

P.O. Box 100

Sacramento, CA 95812

Email: commentletters@waterboards.ca.gov

Re: Opposition to Draft WDR General Order R5-2012-0116 for E. San Joaquin River Watershed

Subject: Comments to A-2239(a)-(c)

Dear Ms. Townsend:

We are walnut and rice growers within the boundaries of the Placer-Nevada-South Sutter-North Sacramento (PNSSNS) Subwatershed coalition group. We oppose the subject proposed Order which would affect all watershed coalitions in California.

As part of our work in agriculture, we continuously educate ourselves in all related matters, including water quality. We care about clean water, soil, and air, and healthy ecosystems, just as others do. We follow best management practices and do our best to conform to all regulations, whether or not they apply to us. As new research and technology becomes available, we go to great lengths to update large components of our business, such as irrigation systems, spray application equipment, and related management tools. Current water quality regulations can be fine-tuned, but additional, more rigorous and unreasonable regulations as proposed would not serve us or the environment. The proposed Order would provide no dependable solutions, create redundancy and confusion, be costly in time and money (possibly closing businesses), and lack protection of individual privacy.

The PNSSNS subwatershed coalition group, which started in 2003, has a respectable history of following regulations as they became established, communicating with members, collecting fees, monitoring water quality, and maintaining acceptable results. We have worked to follow rules when no guidelines were provided on how to implement them. Despite being in compliance, more stringent requirements are being proposed. There appears to be very little expertise or planning, nor democracy or sense of fairness, in how the State Water Board is making and constantly changing regulations for people of California in agriculture. Thank you for your time, and please take all practical views into consideration regarding the proposed Order.

Sincerely,

Ellen Fickewirth
Walter Fickewirth

Grower and PNSSNS Member

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