

G&J Farms, LLC.
4124 South Gratton Rd.
Denair, Calif. 95316



May 17, 2016

Ms. Jeanie Townsend
Clerk of the Board
State Water Resources Control Board
1001 I St. 24th Floor 95814
P.O. Box 100
Sacramento, Calif. 95812-0100

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

Dear Chair Marcus and Members of the Board:

I am a 4th generation farmer in the Turlock, Stanislaus county area. Our primary crop is Almonds. My family was instrumental in settling in this area in the early 1900's. We have always been very proud of what we have provided to our communities and the world. We also have been stewards of the land and waters of our area as this is what our lively hood is dependent on. To that end we have always taken great care of our natural resources so that future generations will be provided for.

I have been following the State Water Resources Control Board's Proposed Order revising the East San Joaquin Water Quality Coalitions General Waste Discharge Requirements. We are a member of this Coalition. The Coalition has taken great pride in providing additional information to further our commitment to be good stewards of our lands. I am very concerned that my ability to continue to farm will be unnecessarily and 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.

Of particular concern to my farming operation:

1. There will be additional costs of compliance.
2. It may erode the continued existence of the coalition as the Proposed Order undermines the usefulness and benefit of the coalitions.
3. It will create privacy concerns given the requirements for the coalitions to submit all raw data, including field –specific farm evaluation and management practice data identified by location and all nitrogen application data by field, identified by location. All this information will become publically available. This information is now submitted aggregately at the township level and is accessible to the Regional Board if needed.
4. It will upset the current monitoring and reporting requirements within the existing irrigated lands regulatory program which provides the Regional Water Board with ample information needed to

determine the effectiveness of the program regarding water quality concerns in compliance with the Water Code and the State Water Board's policies.

5. It includes new nitrogen application accounting requirement of which there are a limited amount of nitrogen coefficients developed for crops grown in California. This will place significant new and unnecessary burdens on farmers.

In conclusion these changes will only increase our costs for farming. This seems to be just another layer of government involvement in how we run our business. We will not be successful and provide to our state in taxes if more unneeded regulations are required.

Thank you for considering my thoughts and views on this issue.

Respectfully submitted,

Gary Taylor,
Owner

A handwritten signature in blue ink that reads "Gary Taylor". The signature is written in a cursive style with a long horizontal flourish extending to the right.

G&J Farms, LLC