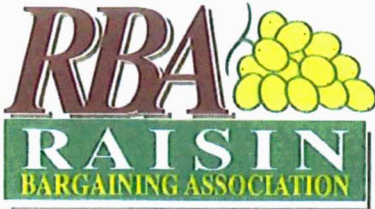
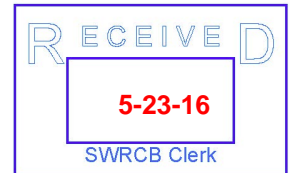


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May 18, 2016

Ms. Jeanie Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100
commentletters@waterboards.ca.gov



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

Dear Chairperson Marcus and Members of the Board:

The Raisin Bargaining Association (RBA) represents approximately 1,000 grape growers who farm their vineyards within a 100 mile radius of Fresno. Growing grapes to be dried into raisins is an extremely challenging profession. Typical raisin growers farm about 80 acres of vineyard and average over 60 years of age. A fair percentage of our membership would be considered small growers by the Small Business Administration definition of a small producer/grower being one that grosses less than \$750,000 annually.

The RBA would like to comment on behalf of our membership in regards to the State Water Resources Control Board's Proposed Order revising the East San Joaquin Water Quality Coalition's General Waste Discharge Requirements (WDR). We believe the WDR being part of the Central Valley Regional Water Quality Control Board's Irrigated Lands Regulatory Program (ILRP) has been a cooperative and effective vehicle for more than a decade. Growers will be subject to additional burdens under the proposed revisions as follows:

- Because the SWRCB has designated the proposed order to be precedential in nature, all Regional Water Boards would be subject to update or develop their irrigated lands regulatory programs to be consistent. Regional coalitions were established based on the fundamental that all areas in the state have their own conditions which was the reason for areas to be designated high or low vulnerability.
- Additional costs will be required due to the increased administration of a proposed rule encompassing the entire state. Individual growers, coalition, and Regional Board costs will increase due to the new requirements to collect and compile all raw data.
- The proposed order creates privacy concerns given the requirements for coalitions to submit raw data, including specific farm evaluation and management practice data identified by location and all nitrogen application data by field identified by location. Currently the coalitions submit data in aggregate form with raw data accessible to the Regional Board if needed.

- Upsets the current monitoring and reporting requirements within the existing irrigated lands regulatory program which already provide 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 SWRCB's policies.
- The proposed nitrogen application reporting requirements will place significant new and unnecessary burdens on our growers. Each farm will be required to report their crop yield and calculate a nitrogen applied divided by nitrogen removed (A/R) coefficient that could very easily become a regulatory target placed on our growers.
- The proposal erodes the continued existence of trusted coalitions that our members belong to by undermining their usefulness and benefit.
- Finally, our growers may not have the authority to access drinking water supply wells that the proposed order requires them to monitor.

The Raisin Bargaining Association feels the proposed order revising the East San Joaquin Water Quality Coalition's General Waste Discharge Requirements is problematic and an overreach by the SWRCB based on the above points. Existing coalitions under regional board jurisdiction have grower support and developed training programs. They deserve the opportunity to prove they are working. We pray you will reconsider your proposed order and thank you for allowing us to provide you with our comments.

Respectfully submitted,



Glen Goto
Chief Executive Officer