

May 9, 2016

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Grower

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RE:East San Joaquin Quality Coalition Proposal Order.

Dear Board Members,

I am a grower in San Joaquin County and belong to the San Joaquin County and Delta Water Quality Coalition.

I have great concerns about the Proposal Order for the East San Joaquin Water Quality Coalition. Our agricultural operation currently is just starting to implement the regulation that the Central Valley Regional Water Quality Control Board imposed in 1014. This new regulations include filling out Farm Evaluation Plan, Nitrogen Managements Plans and Nitrogen Summery Reports and submitting the information to the Coalition for evaluation.

The Nitrogen Management Plan self certifications class I attended at the beginning of this year was some how to advance for some of us growers who attended. I had the opportunity to observe, hear all about it across the room. It was quite difficult to accomplish the goal for some of us .The facilitators did a good job presenting the material, but it needs to be simplified. After all we growers are not biologist, chemist or some one in the field of chemicals. The booklet was well put together but it needs to be an educational and simplify manner.

I understand your request for data collections, reporting, record keeping but the paper work is already overwhelming as it is. Plus it will increase fees for growers and paying the coalition for the testing and processing is a big cost as well. It seems to me that more paper work does not address water quality issues. Education, research, and more efficient use of fertilizers will address water quality issues.

The next concern is the quantity of available nitrogen and irrigations specialist to assist growers with the Nitrogen Management Plan under the current Order. The need to adopt this new regulation it is on the rise as well. Making more certified professional available to assist growers will be something to be in the list to assist you and us growers to achieve this goal together. A Grant perhaps should be considered for growers' education as well as for more Certified Professionals to assist us grower with the Nitrogen Management Plan.

I am taking this opportunity to encourage the board to let current Orders be implemented. As growers become more educated by taking the Nitrogen Management Plan Self Certifications Class, more



research on Nitrogen efficiency are being conducted, and the Coalition is analyzing information to help determine those areas of concerns. The proposed changes would be costly and burdensome to family farmers throughout the state and not improve water quality.

About the private drinking water supply well monitoring and reporting it should be assigned to the County Public Health Department. This is to include some if not all of the financial funding aspect of the current Order implementation. For example, I am in area where a dairy farm was active in the past. I don't see the reason I, as a farmer should be picking up the tab on this one. I agree with what the coalition believes this type of private drinking water regulation should be done through the County Department of Health, and is outside the preview of the Irrigated Land Regulatory Program.

In conclusion, The future possible law suits are already taking place this just brings a lot more complications to the new implementation of this new Order if it goes public record. I am sure that none of us farmers look forward to this type of situaions.

*Guillermina Salgado*