

## commentletters

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**From:** Mike Verschagin <mverschagin@sbcglobal.net>  
**Sent:** Tuesday, May 17, 2016 11:12 AM  
**To:** commentletters  
**Subject:** Proposed East San Joaquin Water Quality Orders



Ms. Jeanie Townsend  
Clerk to the Board  
State Water Resources Control Board  
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RE: Comments to A-2239(a)-(c)

Dear Chair Marcus and Members of the Board:

I am a farmer who grow almonds and dried plums in Glenn County, California. I have been following the State Water Resources Control Board's Proposed Order revising the East San Joaquin Water Quality Coalition's General Waste Discharge Requirements, and I am concerned that my ability to continue to farm will be unnecessarily negatively burdened by time and expense of 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 is:

The Proposed Order and its regulations over rules the local coalitions that have done an excellent job in providing data to the SWRCB as had been required. The new Proposed Order will expose potential confidential information to the public since the public will be able to request the records through a Public Record Request. Local coalition reporting aggregate data is a more reasonable approach, even though we are paying for this service.

The approach the SWRCB is taking, is that farmers and property owners are guilty and must prove there innocence by providing information through reporting to the SWRCB. What proof is there that these costly and time consuming regulations is going to address supposed violations that is allegedly occurring on farms and ranches. Why impose these costly and time consuming regulations on everyone for a few "bad apples". It's like saying everyone must pay for a speeding ticket because someone else is speeding. Last I heard that is not legal.

Thank you for considering my views.

Respectfully submitted,

Mike Vereschagin  
President,  
Vereschagin Farms Inc.