

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:

May 30, 2016

Our family has been raising row crops in Yolo County for five generations. My job on our farm is to keep us in compliance with all the mandated county, state and federal regulations. 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 am very concerned that our family's ability to continue farming will be unnecessarily 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 also throughout the state.

Quite honestly, the Irrigated Lands Program already takes a considerable amount of my time to complete every year. The changes proposed will burden our farming operation including the costs of compliance (administrative and hard costs, costs to be a coalition member, reporting costs, etc.).

The Proposed Order is precedential and would give direction to the Central Valley Water Board and all other Regional Water Boards to update or develop their irrigated lands regulatory programs to be consistent with the Proposed Order. This one-size-fits-all approach neglects to consider the considerable differences of the State's geographical areas. What applies in one area certainly does not apply to all.

The Proposed Order creates concerns about privacy, as the data collected will now become publically available. This includes field-specific farm evaluation and management practice data identified by location and all nitrogen application data by field, identified by location. These are lawsuits just waiting to be filed!

The Proposed Order upsets the current monitoring and reporting requirements within the existing irrigated lands program which 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 State Water Board's policies.

The Proposed Order includes new nitrogen application accounting requirements and the development of nitrogen removed coefficients. This will place significant new, unnecessary burdens on our farm and other farmers. Again, the current Irrigated Lands Program already takes a considerable amount of time to complete each year. This new requirement is particularly onerous.

The Proposed Order requires every farm to monitor its drinking water wells, including land owner or tenant wells that we may not have the authority to access. What is the purpose of this? Again, more lawsuits?

Farmers in Yolo County currently work cooperatively with our Yolo County Farm Bureau office to comply with the Irrigated Lands Program. We have a positive relationship with Yolo County Farm Bureau staff and I am comfortable asking for guidance and assistance on the Irrigated Lands Program. I highly doubt this kind of personal assistance will be available with the changes proposed.

Farmers already have enough on our plates. This Proposed Order will add unnecessary, burdensome new requirements with questionable reasons for doing so ... and it invites law suits that no one wants or needs.

Sincerely,

Patty Rominger

Rick and Bruce Rominger

Rominger Brothers Farms

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