

May 6, 2016

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
P.O. Box 100
Sacramento, CA 95812-0100



RE: East San Joaquin Water Quality Coalition Proposed 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 Proposed Order for the East San Joaquin Water Quality Coalition. Our agriculture operation currently is just starting to implement the regulations that the Central Valley Regional Water Quality Control Board imposed in 2014. The proposed changes your Board now wish to implement are not in the spirit of co-operation and good faith we have worked towards.

This Proposed Order would increase the paperwork for all growers and would increase the fees a grower would have to pay the Coalition in order to collect and process the paperwork. Paperwork does not address water quality issues. Education of growers, research and more efficient use of fertilizers will address water quality issues. Changing the rules and the cost in the middle of the process is not fair.

How will all the Nitrogen Management Plans be certified? There are not enough nitrogen and irrigation specialists available to do the plans under the current Order. If the proposed Order is adopted, the number of growers requiring a certified Nitrogen Management Plan would double triple. How would we comply with the new regulations if there are not the qualified professionals to certify the plans?

I encourage the Board to let the current Orders be implemented in good faith as originally envisioned. Growers are becoming more educated by taking Nitrogen Self Certification Classes, research on nitrogen efficiencies are being conducted and the Coalition is analyzing information to help determine the areas of concern. The proposed changes would be costly and burdensome to family farmers throughout the state and not improve water quality. Arbitrary action without considering the good faith process currently in place is simply wrong.

Sincerely,

Richard Samra
3212 Shelter Cove Lane
Elk Grove, California 95758